

# STAGE 1 PRELIMINARY SITE (CONTAMINATION) INVESTIGATION

To Support Planning (Rezoning) Proposal  
From Zone RU1 Primary Production to Zone R5 Large Lot Residential

9R Belgravia Rd, DUBBO NSW  
Lot 5 DP817149



*Figure 1: Aerial photo showing subject site (red dotted line/yellow fill) & surrounding sites (Source: SIX Maps).*

**Applicant:** David & Carmen Isbester  
c/- iPLAN PROJECTS, 91 Heifer Station Ln, BORENORE NSW 2800

**To be lodged with:** Dubbo Regional Council

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## Document Control

Version	Date	Document	Provided To
A	26 October 2021	Draft for Confirmation	Client/ Dubbo Regional Council/DPIE

# 1 OVERVIEW

## 1.1 Reason for this Report

iPLAN PROJECTS prepared a Planning Proposal seeking to amend *Dubbo Local Environmental Plan 2011* ('DLEP2011') for 9R Belgravia Rd, DUBBO so that it is removed from the current Zone RU1 Primary Production area (800ha Lot Size) and rezoned to Zone R5 Large Lot Residential with the introduction of a minimum lot size of 8ha.

The Department of Planning & Environment ('DPE') has issued a Gateway Determination dated 16/09/21 with the following condition:

1. Prior to community consultation a revised planning proposal is to be resubmitted that addresses:-

Potential contamination - a preliminary contamination investigation to demonstrate to Council that the subject land is suitable or can be made suitable for the proposed large lot residential use.

Council is to seek approval from the Department of Planning, Industry and Environment – Western Region prior to undertaking community consultation.

This report seeks to provide that initial site contamination investigation report in a format that would be considered a *Stage 1 Preliminary Contamination Investigation* ('*Preliminary Investigation*' or 'this Report') to be exhibited with the Planning Proposal.

The main objectives of a preliminary investigation are to identify any past or present potentially contaminating activities, provide a preliminary assessment of any site contamination and, if required, provide a basis for a more detailed investigation.

## 1.2 Recommendation(s)

This *Stage 1 Preliminary Contamination Investigation* has found the subject site/lot has only been used for extensive agriculture (grazing) and some limited cultivation for pasture and for one (1) lifestyle dwelling with on-site effluent management system approved by Council.

Whilst agriculture MAY be a potentially contaminating activity under the relevant contamination guidelines, policies and legislation – we suggest there is a low risk of contamination due to the low level of agricultural activity over the last 50 years and there is no known or likely failure of the existing on-site effluent system (existing system and dwelling retained – so no additional impact).

Whilst the future development of the land may result in an addition 2-3 new dwellings with on-site effluent systems, these will be on lots >8ha in area so there is unlikely to be any issue with design suitable on-site effluent management systems (suitably geo-technical reports to be provided as part of any future development application for subdivision).

All of the surrounding land is either used for lifestyle rural residential lots or has limited agriculture. The risk of contamination from these nearby activities is low for the same reasons as above.

The site is already being used for a residential purpose with an existing dwelling. We recommend that **no additional soil sampling or Stage 2 Detailed Contamination Investigation is required and this site is suitable for a residential zoning** and, if required, further residential subdivision.

The public exhibition of this document with the Planning (Rezoning) Proposal provides the opportunity for the community to comment on this Preliminary Investigation and to come forward with any additional information relevant to this assessment.

## 2 STATUTORY REQUIREMENTS

### 2.1 Overview

As set out in the Central NSW Regional Contaminated Land Policy Template:

*"Contaminated land is managed by Council to minimise the impacts of past land use on the orderly development of land in the future. Land may have become contaminated by actions in the past when issues around contamination, pollution and waste management were not considered important by the community and the long-term effects of some chemicals on the environment and human health were poorly understood.*

*The Environment Protection Authority (EPA) is the State body that regulates contaminated land under the Contaminated Land Management Act 1997; however, Council has responsibility to ensure that when exercising its statutory planning functions in relation to the development of contaminated land, all the relevant information is considered.*

*To do this Council must:*

- Consider the likelihood of land contamination as early as possible in the planning and development control process;*
- Link decisions about the development of land with the information available about contamination possibilities;*
- Adopt a policy approach which will provide strategic and statutory planning options based on the information about contamination; and*
- Exercise statutory planning functions with a reasonable standard of care."*

### 2.2 Legislation, Policy & Guidelines

The key requirements to address Contamination are set out in the following statutory/legislative requirements:

- a) Contaminated Land Management Act 1997;*
- b) Environmental Planning & Assessment Act 1979;*
- c) Protection of the Environment Operations Act 1997;*
- d) State Environmental Planning Policy (SEPP) 55 – Remediation of Land ('SEPP55');*
- e) National Environmental Protection (Assessment of Site Contamination) Measure 1999;*
- f) Managing Land Contamination Planning Guideline (1998) ('Contamination Guidelines') – Dept. of Urban Affairs and Planning/EPA;*
- g) Guidelines for Consultants Reporting on Contaminated Sites (2011) ('Consultant Guidelines') – Office of Environment & Heritage;*
- h) Western Plains Regional Council – Contaminated Land Policy (2016) CCL16/149*
- i) Central NSW Regional Contaminated Land Policy Template.*

In accordance with the *Reporting Guidelines* (see above) a *Stage 1 Preliminary Site Investigation* should:

- a) Identify all past and present potentially contaminating activities;*
- b) Identify potential contamination types;*
- c) Discuss the site condition;*
- d) Provide a preliminary assessment of site contamination;*
- e) Assess the need for future investigations.*

### 2.3 SEPP 55 (Remediation of Land)

It is important to note that under *State Environmental Planning Policy (SEPP) No.55 Remediation of Land* that *Section 6 – Contamination and remediation to be considered in zoning or rezoning proposal* - has been repealed on 17 April 2020. Therefore, it is only under the Ministerial Directions that this issue must be considered at the Planning Proposal stage (see next section). *Section 7 – Contamination and remediation to be considered in determining development application* - suggests this is a key stage for determining contamination issues.

### 2.4 Ministerial Directions

Ministerial Directions under Section 9.1 of the EP&A Act includes *Direction 2.6 – Remediation of Contaminated Land*. The Direction applies to the preparation of a Planning Proposal where, amongst other things, land is **proposed for residential use** in relation to which there is no knowledge (or incomplete knowledge) as to whether there has been a 'potentially contaminating land use' under Table 1 of the contaminated land planning guidelines on the land.



### What a planning proposal authority must do if this direction applies

- (4) A planning proposal authority must not include in a particular zone (within the meaning of the local environmental plan) any land specified in paragraph (2) if the inclusion of the land in that zone would permit a change of use of the land, unless:
- (a) the planning proposal authority has considered whether the land is contaminated, and
  - (b) if the land is contaminated, the planning proposal authority is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for all the purposes for which land in the zone concerned is permitted to be used, and
  - (c) if the land requires remediation to be made suitable for any purpose for which land in that zone is permitted to be used, the planning proposal authority is satisfied that the land will be so remediated before the land is used for that purpose.

In order to satisfy itself as to paragraph (4)(c), the planning proposal authority may need to include certain provisions in the local environmental plan.

- (5) Before including any land specified in paragraph (2) in a particular zone, the planning proposal authority is to obtain and have regard to a report specifying the findings of a preliminary investigation of the land carried out in accordance with the contaminated land planning guidelines.

**Note:** In this direction, **contaminated land planning guidelines** means guidelines under clause 3 of Schedule 6 to the *Environmental Planning and Assessment Act 1979*.

We suggest that this *Preliminary Assessment* contains sufficient information/knowledge of previous land use history and likelihood of contamination to recommend that whilst there has been some limited chemical use for extensive agriculture this is a relatively low risk and should not warrant the need for detailed investigation or soil sampling.

On this basis, there is sufficient information for the planning proposal authority (Council) to form the conclusion that the **land is unlikely to be contaminated or if there is minor contamination that the land is suitable in its current state for a future residential use** and that a detailed site investigation is unlikely to be required at this time.

## 2.5 Contaminated Land Planning Guidelines

The Guidelines refer to guidelines under Clause 3 of Schedule 6 to the *Environmental Planning & Assessment Act 1979* (EP&A Act).

As of October 2021, it would appear that the *Managing Land Contamination Planning Guidelines SEPP 55 - Remediation of Land* (Department of Urban Affairs and Planning and EPA 1998) (Planning Guidelines) are still the adopted guidelines. However, there is also a DRAFT (2018) *Contaminated Land Planning Guidelines* (Draft Guidelines) that do not yet appear to have been adopted. These are also informed by other statutory guidelines – including the EPA (2020) *Consultants reporting on contaminated land – Contaminated Land Guidelines* (Consultant Guidelines).

These guidelines make it clear that they adopt a site-specific risk assessment which follows a tiered approach. Tier 1 (this Report) is a screening assessment stage where generic assessment criteria are compared to the site & historical land uses to see if further assessment is needed.

Section 3.2.1 of the Contamination Guidelines sets out a suggested checklist for initial evaluations stating:

*The potential for contamination is often linked to past uses of land and a good early indicator of possible uses is land zoning. Contamination is more likely to have occurred if the land is currently, or was previously, zoned for industrial, agricultural or defence purposes. The following is a brief checklist for doing an initial evaluation.*

- *Is the planning authority aware of any previous investigations about contamination on the land? What were the results, including any previous initial evaluations?*
- *Do existing records held by the planning authority show that an activity listed in Table 1 has ever been approved on the subject land? (The use of records held by other authorities or libraries is not required for an initial evaluation.)*
- *Was the subject land at any time zoned for industrial, agricultural or defence purposes?*
- *Is the subject land currently used for an activity listed in Table 1?*
- *To the planning authority's knowledge was, or is, the subject land regulated through licensing or other mechanisms in relation to any activity listed in Table 1?*
- *Are there any land use restrictions on the subject land relating to possible contamination, such as notices issued by the EPA or other regulatory authority?*
- *Does a site inspection conducted by the planning authority [optional] suggest that the site may have been associated with any activities listed in Table 1?*
- *Is the planning authority aware of information concerning contamination impacts on land immediately adjacent to the subject land which could affect the subject land?*

The Contamination Guidelines suggest an indicative list of activities that may cause contamination that should be considered on any site set out below. It is noted that the Subject Site has had agricultural activities but these are limited in nature and explained below. There is no evidence that this rural land has had intensive agriculture or activities associated with animals and heavy chemical use such as sheep and cattle dips. There is no evidence of industrial activities on the land.

**Table 1. Some Activities that may Cause Contamination**

- acid/alkali plant and formulation
- agricultural/horticultural activities
- airports
- asbestos production and disposal
- chemicals manufacture and formulation
- defence works
- drum re-conditioning works
- dry cleaning establishments
- electrical manufacturing (transformers)
- electroplating and heat treatment premises
- engine works
- explosives industry
- gas works
- iron and steel works
- landfill sites
- metal treatment
- mining and extractive industries
- oil production and storage
- paint formulation and manufacture
- pesticide manufacture and formulation
- power stations
- railway yards
- scrap yards
- service stations
- sheep and cattle dips
- smelting and refining
- tanning and associated trades
- waste storage and treatment
- wood preservation

*Figure 2: Excerpt of Table 1 from Contamination Guidelines*

The Draft Guidelines state the following:

**Where no contamination is suspected, or none is identified**

Having undertaken an initial evaluation, if a planning authority is satisfied that contamination is unlikely to be an issue and is satisfied it has sufficient information to make this decision, then the planning authority should record this decision and planning process should proceed as usual.

### 3 EXISTING SITE & PROPOSED DEVELOPMENT

#### 3.1 Site Identification & Land Use Context

The Site is known as 9R Belgravia Rd, DUBBO. It has an area of ~40.68ha.

It is located approximately 6-7km to the south of the urban area of Dubbo with access from Obley Rd (see map below) to Belgravia Rd. There is one (1) existing dwelling and some small sheds on the Site at this time.

The surrounding area is a mix of land uses with the Zoo to the north, surrounding lifestyle lots immediately to the east and south of the Site, and agriculture. More intensive forms of agriculture are located along the Macquarie River flats to the east of Obley Rd. Vegetation and topography result in pockets of cultivated lands in the area of the Site but this is limited. Its conversion to 'lifestyle lots' since the 1980s/90s is the primary use/character of the area.

The Site has a sort of 'L' shape so it has frontage to Belgravia Rd (~273.63m) to the east (south-east quadrant) and frontage to Belmont Rd (~414.2m) to the north (north-west quadrant) (see Deposited Plan on attached Planning Proposal Subdivision concept plans).

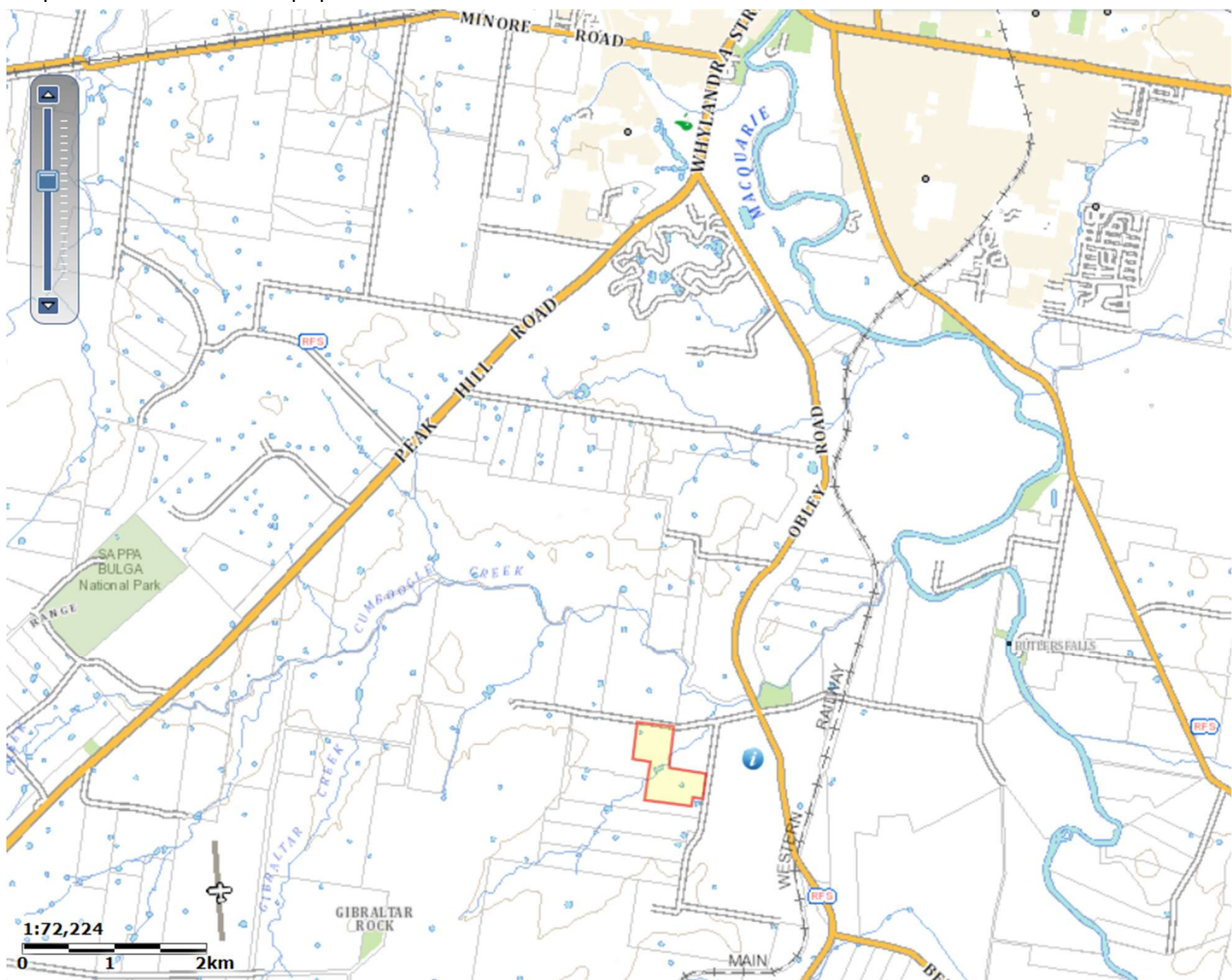


Figure 3: Map showing location of subject site (yellow box with red outline) (Source: NSW Government SIX Maps).

#### 3.2 Ownership & Approvals

We have not conducted a detailed review of the ownership of the land. The current owners have held the land for more than twenty (20) years (from the year 2000). At the time of purchase the land was vacant except for two (2) sheds – one near Belmont Rd and one near Belgravia Rd. A dwelling was approved on the property with access from Belgravia Rd in approximately 2001 with the on-site sewage management system (DA2001/0020) (septic) approved on 20 April 2001.

Prior to this, the land formed part of a larger agricultural holding (~500 acres) owned by Ms Nancy Boa. The land was subdivided into ~100 acre lots including the current lot and was subdivided for the purpose of a dwelling (we have not confirmed the date of this subdivision). We believe this may have coincided with the large lot residential release of land to the east of the Site in the 1980s/90s.



### 3.3 Proposed Development

The Proposal seeks to rezone the land from its current rural zone (Zone RU1 Primary Production) to Zone R5 Large Lot Residential which is present on the lands immediately to the east of the Site.

Concurrently, there would be a reduction in minimum lot size (MLS) for subdivision from 800ha to 8ha. This would permit up to four (4) lots (see Subdivision Concept below) but subject to road upgrade requirements this may be limited to three (3) lots – two (2) lots fronting Belgravia Rd (sealed) and one (1) lot fronting (Belmont Rd).

As a result, there would be a minor intensification of residential uses on the land that would not be permitted under the current planning controls. This triggers the requirement for a contamination assessment.

Dwelling envelopes for the proposed lots are likely to be situated ~50m-150m from each road frontage to provide sufficient buffer to road noise/impacts, minimise vegetation removal, and avoid the watercourse that runs through the centre of the Site (see Planning Proposal for more details).

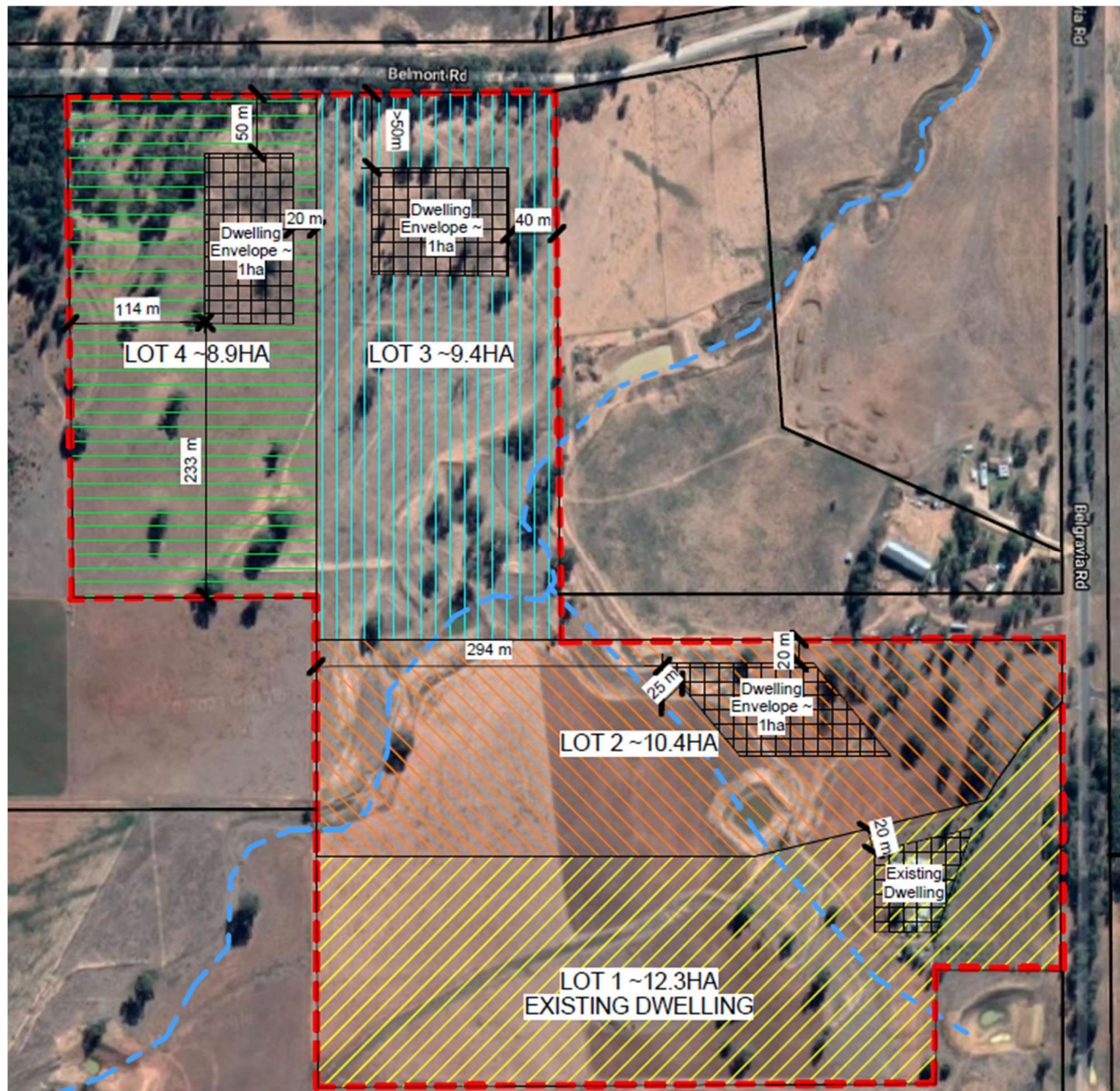


Figure 4: Except of Subdivision Concept (Indicative) Plan A301 (iPLAN PROJECTS).



## 4 STAGE 1 PRELIMINARY INVESTIGATION

The following seeks to provide a *Preliminary Contamination Investigation* in accordance with the Statutory requirements limited to a desktop and historical analysis of land uses on the Site, potential for contaminating activities, and risk from any activities identified.

### 4.1 Recorded Contamination Issues

#### 4.1.1 Contaminated Lands Record

An assessment of the NSW EPA *Contaminated Land Record* was conducted at the time of preparing the Planning Proposal (the Site was not recorded as being affected by contamination) and is updated here. A search of the public record was undertaken on 26/10/2021 for the Dubbo LGA. Only two (2) sites are listed (see below) and neither of these include the Site or are near the Site (both are in the urban area of Dubbo). The Contaminated Lands Record is not conclusive as it may not list all of the contaminated sites in a Local Government Area (LGA) so the land is further investigated below.

*Figure 5: Excerpt of Contaminated Lands Record for Dubbo LGA 26/11/2021 (www.epa.nsw.gov.au).*

#### Search results

Your search for: LGA: DUBBO REGIONAL COUNCIL

Matched 11 notices relating to 2 sites.

[Search Again](#)

[Refine Search](#)

Suburb	Address	Site Name	Notices related to this site
DUBBO	Cnr Brisbane Street and Cobra STREET	<a href="#">Caltex Service Station, Dubbo</a>	2 current and 6 former
DUBBO	165 Brisbane STREET	<a href="#">Former Ambulance Station</a>	3 former

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#### 4.1.2 Licenses / Orders/ Notices/ Investigations

To the best of our awareness there are no contamination orders, notices, investigations or contamination audits applying to the subject site at this time or in Council's records and no suggestion of licensing of any such activities on the subject site. Whilst we have not requested a Section 10.7 Planning Certificate from Council to confirm this, it is expected that Council has conducted their own investigations in this regard.

#### 4.1.3 Dangerous Good Search

Please note that we have not searched the Stored Chemical Information Database (SCID) or the microfiche records held by the (former) NSW WorkCover to identify the presence of dangerous good storage licences for the subject site or adjacent site but do not believe these would be relevant to the subject site as there is no evidence of any significant storage facilities on the site (small garages/sheds only) or on surrounding sites.

#### 4.1.4 Naturally Occurring Asbestos

A review of the SafeWork NSW Naturally Occurring Asbestos mapping suggests that there is no likely mapped presence of this in or around the Site. The nearest areas are a small pocket west of the Newell Hwy (near Momo State Forest) and low potential east of Terrabella (near Geurie).

### 4.2 Site Condition & Surrounding Environment

This is addressed in detail in the iPLAN PROJECTS (10 March 2021) *Planning Proposal* so it is not repeated here.

### 4.3 Potential Human & Ecological Receptors (On & Off Site)

The sensitivities for contamination (where it to be present on the Site) may include humans in existing/future dwelling on and surrounding the Site, visitors, construction workers, and maintenance workers. It may also impact on the natural environment/ecology of the Site including soils, the surface water in the watercourse through the Site, groundwater, and flora/fauna.

Exposure pathways for contaminants may include dermal contact following soil disturbance, ingestion and inhalation after soil disturbance, surface water and sediment run-off into waterways, leaching of contaminants into the groundwater, and direct contact of flora and fauna with the soil. The Site is in an area of moderately high to high groundwater sensitivity (that roughly follows the drainage corridor and lower lying lands). However, previous geotechnical studies have not found groundwater in the first few metres of the soil.



## 4.4 Site Photos

*Figure 6: Site photos.*



*Photos of (left) intersection Belmont & Belgravia Roads; (right) Belmont Road watercourse crossing.*



*Photos of (left) entrance to Site; (right) view to dwelling/sheds on Site from Belgravia Road.*



*Photo looking west from house yard on Site across flat land.*



*Photo of the existing dwelling & shed(s) in the house yard (looking east).*



*Photo of the Site from Belmont Rd (near north-west corner).*



## 4.5 Previous Zoning & Surrounding Land Uses

This is addressed in detail in the Planning Proposal. However, in summary it is likely the Site has always had a rural zoning that is currently Zone RU1 Primary Production and was previously in Zone 1(a) Dryland Agriculture. Standard agricultural practices are addressed below – but there is limited risk that this land was suitably zoned for higher-impact / potentially contaminating land uses such as industry. The dwelling was permitted on the lot as the lot was likely created for the purpose of a dwelling prior to the introduction of the 800ha minimum.

It is important to note that since some time in the 1980s/90s the land immediately to the east was permitted to be used for large lot (rural/lifestyle) residential lots down to 8ha in size and this land has been progressively developed for this purpose since that time. These lifestyle lots pose very limited risk for contamination as, other than on-site effluent systems and minor use of herbicide for weed management, they are unlikely to involve any potentially contaminating land uses.

It is important to note that surrounding agricultural land is also limited in area and agricultural productivity. This land is not the same risk as intensive horticulture along the Macquarie River flood plains. There may be sporadic cultivation and cropping but the surrounding land is mostly used for grazing. Risk of contamination to the Subject Site is low as all land-owners are required to ensure their chemical spraying does not impact neighbouring properties.

## 4.6 Site History & Land Use Activity

This Section shows historic aerial photographs of the Site from 1964, 1968/71, 1980, 1991, 1995, 2003, 2006, 2012, 2018, 2021 to show that, except for the house constructed more recently, the land has only ever been used for agriculture – and predominantly for extensive agriculture with limited cultivation.

This spacing of aerial photographs is sufficiently close and detailed to show there is no evidence of any high-impact activities or uses and no significant gaps in history to conceal a use. These are reliable aerial photographs sourced from the NSW Government & Google Earth Historical Aerial Photos and are verifiable and allow for evidence-based decisions by the planning authority.

In summary, the aerial photographs show no evidence of any structures or buildings that would support industry or intensive agricultural activities that need further review. Structures are limited to the existing dwelling and 1-2 small sheds. The land has clearly been used for agriculture for a significant time. The landform and vegetation have not significantly changed over the last 50 years.

It has been confirmed with the current owner that there has been limited cultivation on the Site since they have owned in from the year 2000 and this is mostly to plant oats and clover as pasture / stock feed for cattle on the property. There has been no significant herbicide applied as part of this agricultural activity. Mostly the land has been used for grazing at low numbers. This would not qualify as intensive agriculture or horticulture.

The owner states that chemicals that have been applied to the land in the last 20 years result mostly from limited use of 'RoundUp' (glyphosphate) for weed spraying using a hand-held kit in small volumes, applied directly to weed species in limited areas, and in conditions where this is unlikely to spread to waterways or neighbouring properties. The quantities are unlikely to be significant enough to result in build-up in soils or the ecosystem.

Storage of chemicals would have been up to a few drums of herbicide kept in sheds or garages where they are mixed in the spray kits with water. There should be limited risk of significant contamination at low levels of chemical storage where this is not a major agricultural operation. Farm sheds have not been specifically viewed.



**Figure 7: Table summarising activity visible in historic aerial photographs of site (following pages).**

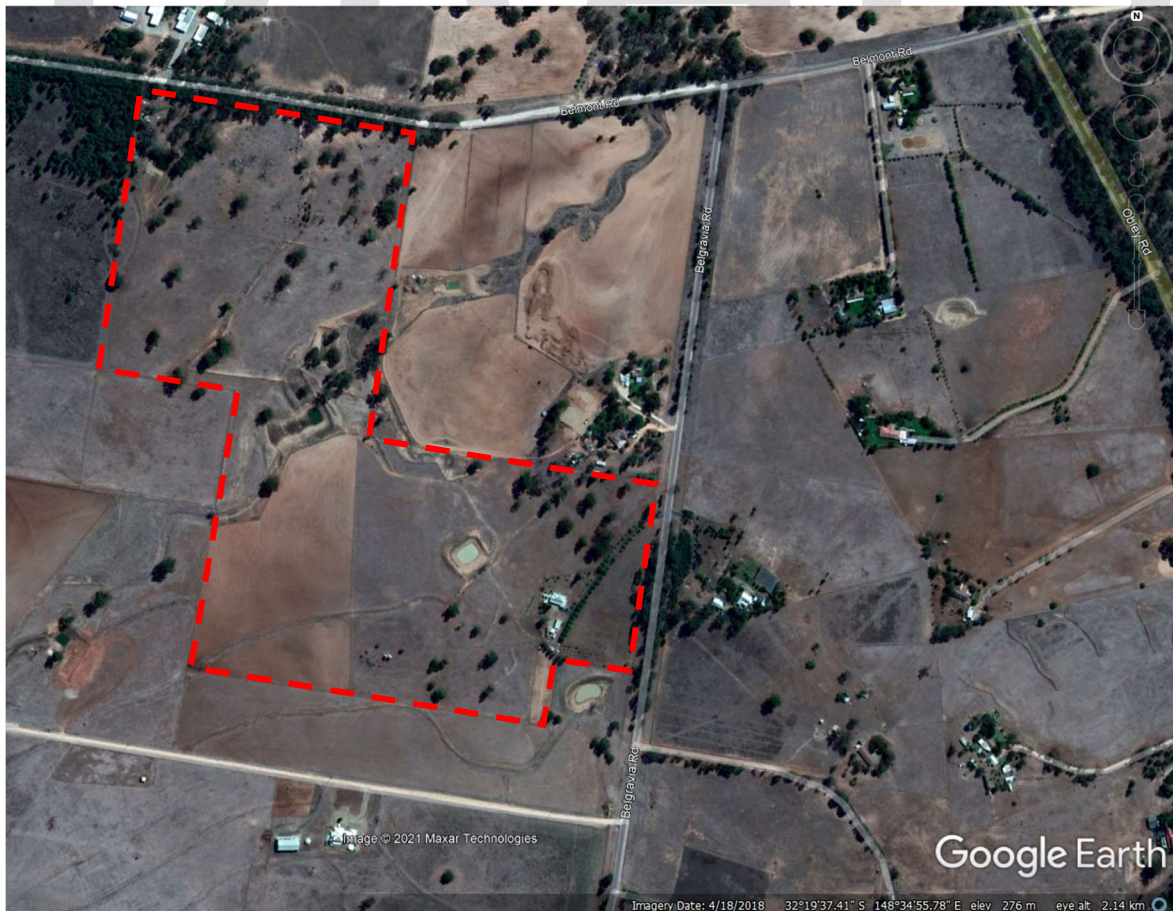
Year	Use/Comment	RISK LEVEL
1964	No current dwelling on Site (dwelling on adjacent area to east). May have been some small sheds in southern half but nothing suggesting any intensive activity. Some limited cultivation in the south-western corner. Scattered vegetation in northern quadrant and south-eastern quadrant would have limited cultivation (extensive grazing likely only). Belgravia Rd does not exist and is only a driveway to dwelling and farmland. Belmont Rd is gravel/dirt road for primary access.	Low – only extensive ag. & weed removal / cultivation practices.
1968/71		
1980	New dwellings on neighbouring property to the north-east of the Site and some lifestyle dwellings to the east of Belgravia Rd (area changing to rural residential character). No change from above re structures or agriculture. Dams in southern half and along creek constructed between 1980 and 1991. Possibly some contour banks added for drainage.  Belgravia Rd constructed between 1968 and 1980 (possibly as gravel road) and then sealed by 1991. Belmont Rd remains unsealed. Some limited vegetation removed from south-east quadrant of land.	Low – only extensive ag. & weed removal / possible cultivation practices.
1991		
1995	Cultivation on adjacent block to north-east of Site. No tilling of soil on Site at this time. No significant change from above re infrastructure, structures/buildings, agriculture, or native vegetation cover.	Low – only extensive ag. & weed removal / cultivation practices.
2003	<b>New dwelling and sheds constructed between 1995 &amp; 2003 in south-eastern section of Site off Belgravia Rd making this more like a 'lifestyle lot'.</b> Has an approved on-site effluent system (not changing in this Proposal). South-west area remains only area cleared of trees and possibly used for cultivation but soil does not appear tilled even though land to south tilled. Likely only extensive grazing. No significant change from above re infrastructure, structures/buildings, agriculture, or native vegetation cover.	Low On-site effluent approved & does not appear to be failing.
2006	Cultivation on adjacent block to north-east of Site. Some limited cultivation in north-west quadrant of Site but trees have limited area. Possibly some minor increase in contour banks and/or farm paths. No significant change from above re infrastructure, structures/buildings, agriculture, or native vegetation cover.	Extensive ag. (grazing) & weed removal with limited (sporadic) cultivation practices.
2012	New dwelling on land to the south. Additional driveway planting for existing dwelling on Site. Possibly a minor increase in central dam size. No significant change from above re infrastructure, structures/buildings, agriculture, or native vegetation cover.	
2018	Limited cultivation of south-western corner of Site and land to north-east of Site. Rest of Site likely to be used for extensive agriculture (grazing). No significant change from above re infrastructure, structures/buildings, agriculture, or native vegetation cover.	
2021	Limited cultivation of lands to south and north-east of Site. No visible tilling of Site. Site likely to be used for extensive agriculture (grazing). No significant change from above re infrastructure, structures/buildings, agriculture, or native vegetation cover.	

*Figure 8: Historic aerial photographs of site (following pages).*

2021 Google Earth



2018 Google Earth





2012 Google Earth



2012 NSW SIX Maps





2006 Google Earth

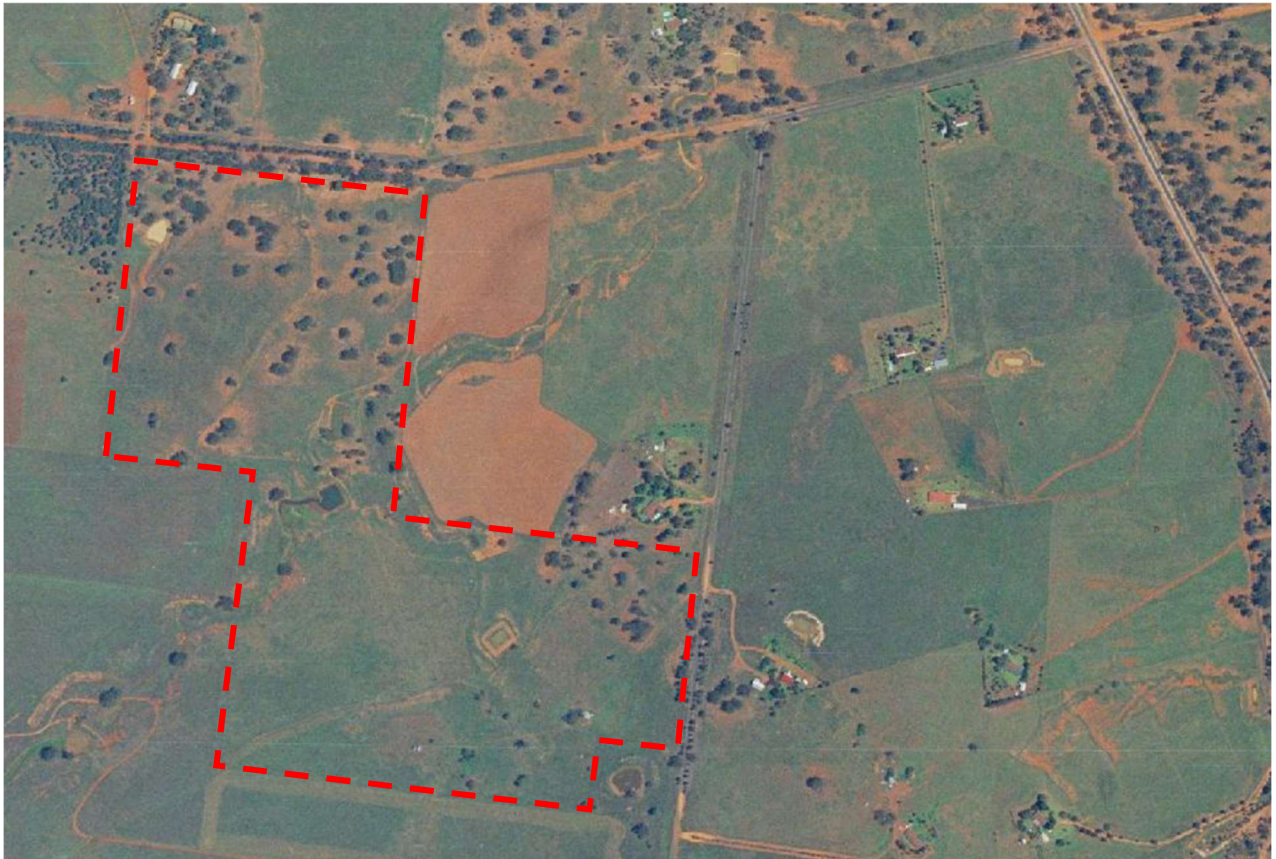


2003 Google Earth





1995 NSW Government Spatial Portal (Historic Imagery)



1991 NSW Government Spatial Portal (Historic Imagery)





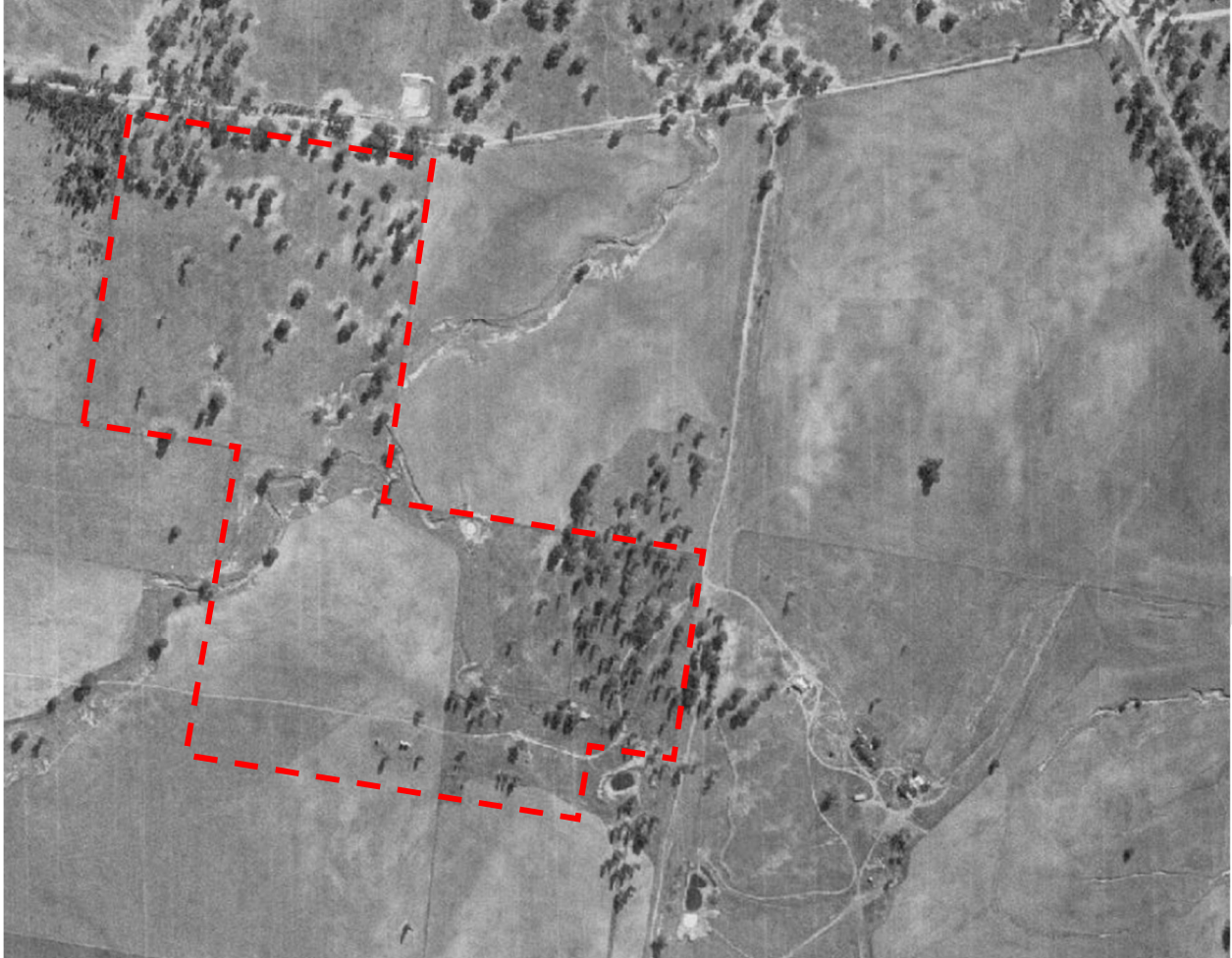
1980 NSW Government Spatial Portal (Historic Imagery)



1968/1971 NSW Government Spatial Portal (Historic Imagery)







#### 4.7 Scope of Work/ Limitations of Liability

**iPLAN PROJECTS** has prepared this report for the purpose of supporting this Planning Proposal only and not for any other purpose (without our consent). Our relevant qualifications are in town planning, urban design, and biological ecology.

However, we are not a certified contamination consultant or geo-technical engineer and we have not conducted any soil sampling as part of this investigation. The findings of this report are limited to the site history and investigations (most available publicly/desktop studies), discussions with the current owner, and assessment of site photos and historical aerial imagery. We have relied on information provided. Nothing in this report should be taken to imply that **iPLAN PROJECTS** has verified or audited any of the information supplied to us other than as expressly stated in this report. If further information becomes available, we reserve the right to amend this report.

We do not accept any liability for any errors or omissions that are outside our qualifications or that could have been identified with a more detailed investigation. This is a *Preliminary Investigation* only. It is Council's responsibility to ensure they have sufficient information to assess this application in accordance with the relevant legislation and guidelines.