

APPENDIX 1

REMEDIATION ACTION PLAN

**Lot 1 on RP 134828
EPA FILE: BNE**

DATE: 9 January 2009

1 INTRODUCTION

This Remediation Action Plan (RAP) has been prepared for the site located at 71 Stradbroke Street, Runaway Bay in Queensland (the "site"). The site was previously utilised as a boat repair and maintenance facility and is to be remediated in order to enable its planned future development as a residential complex. The southern site boundary adjoins Biggera Creek, the northern and eastern boundaries adjoin residential land and Stradbroke Street runs parallel to the western site boundary.

Soil and groundwater investigations have identified metal contamination (copper, lead, zinc and mercury) in surface soil across the site to approximately 0.8 metres Below Ground Surface (mBGS) and Total Petroleum Hydrocarbon (TPH) and Polychlorinated Biphenyls (PCB) impact to approximately 0.2mBGS on the south-western portion of the site. Metal impact (cadmium, chromium, copper, nickel, lead and zinc) has been detected in groundwater across the site, with the highest concentrations present on the south-western portion of the site. Tributyltin (TBT) was also detected above relevant guidelines in groundwater on the south-west of the site.

All investigations were carried out in accordance with the Department of Environment (now known as the Queensland Environmental Protection Agency [EPA]) *Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland* (May 1998).

1.1 Purpose of the RAP

The purpose of this RAP is to provide an outline of activities, procedures and objectives to ensure the effective and controlled remediation of the site prior to the proposed residential redevelopment. The RAP summarises the current contamination status of the site and describes methods and standards to be followed throughout the project to facilitate successful remediation and ensure protection of human health and the environment. It has been assumed that contaminated soil extends to the site boundaries and extends to the south into the foreshore area of Biggera Creek and adjacent parkland, generating a remediation area of approximately 1,831 m².

1.2 Objective

The primary objectives of the remediation program at this site are as follows:

- To ensure that the site does not present a significant risk to human health or the environment and is suitable for the planned future use as a residential development;
- To prevent the potential long-term generation and release of contamination to the sensitive environmental receptors of Biggera Creek and the shallow aquifer; and
- If practical, the objective is to achieve removal of the site from the Environmental Management Register (EMR). If it becomes apparent during the remediation that removal from the EMR is not practical, the site will remain on the EMR under a revised Site Management Plan (SMP) as a site suitable for residential use.

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2 BACKGROUND

2.1 Site History

The site was utilised as a boat repair and maintenance facility from 1958 until June 2008 and is currently vacant. Potentially contaminating activities associated with the former facility include spray painting, high pressure cleaning, abrasive blasting, chemical storage and waste water storage and release on-site. The south-western portion of the site appeared to have been filled and asbestos building materials were noted in buildings. No abrasive blasting residue was visually identified on site. The site is currently listed on the EPA EMR for the notifiable activity of abrasive blasting.

No potential off-site sources of impact were identified. Potential sensitive receptors of impact arising from the site include the adjacent Biggera Creek to the south and residential properties to the north and east.

2.2 Description of Proposed Development

The site is to be developed as a residential complex fronting Biggera Creek. The buildings will be constructed on a raised platform of clean fill with no basement proposed.

2.3 Previous Assessment Reports

This RAP has been based on the following contamination assessment reports:

- OTEK Australia Pty Ltd (Feb 2008). *Site History Investigation*;
- OTEK Australia Pty Ltd (Apr 2008). *Environmental Site Assessment*; and
- OTEK Australia Pty Ltd (Sept 2008). *Additional Investigation*.

2.4 Site Location & Topography

The area of the site is approximately 1,831 m² and the facility previously utilised a workshop, spray booth and chemical storage shed. Areas to the east and south of the buildings are sealed with concrete and a concrete boat ramp extends south of the spray booth to Biggera Creek. The remainder of the site is unsealed. The site is relatively flat and the south-western area appears to have been filled to level the site.

2.5 Geology

According to published geological maps of the region (Moreton Geology, Queensland, 1:500,000), the site is located on Cainozoic aged Quaternary estuarine deposits. Soil conditions encountered on site consist of silty sand to depths between 0.1 and 0.5 mBGS overlying a medium grained sand with varying quantities of organic matter that extend until indurated sands are encountered at approximately 3.0mBGS.

2.6 Hydrogeology and Hydrology

Groundwater is present at depths between 0.73 and 0.93mBGS and due to the proximity of Biggera Creek, is tidally influenced with fluctuations of 0.02 to 0.08m between high and low tide measured

in on-site wells. The inferred direction of groundwater flow towards the south-west does not appear to be altered by the tides.

Eleven registered groundwater extraction bores are located within a one kilometre radius of the site with the two closest bores located approximately 320m south-east of the site across Biggera Creek and reaching a depth of 6mBGS. Other bores are located north-west of the site. Bores in this area are likely to be utilised for garden irrigation.

3 EXTENT OF CONTAMINATION

3.1 Soil Contamination

Soil metal contamination has been identified across the site from the surface to approximately 0.8mBGS. TPH and PCB impact was detected at depths less than 0.2 mBGS on the south-western portion of the site. Maximum concentrations of soil contaminants were:

| | |
|--|-------------|
| Copper | 16700 mg/kg |
| Lead | 2360 mg/kg |
| Zinc | 4700 mg/kg |
| Mercury | 7.2 mg/kg |
| Total petroleum hydrocarbons (C ₁₀ -C ₁₄) | 240 mg/kg |
| Total petroleum hydrocarbons (C ₁₅ -C ₂₈) | 1020 mg/kg |
| Total petroleum hydrocarbons (C ₆ -C ₃₆) | 2000 mg/kg |
| PCBs | 22.4 mg/kg |

The maximum concentration of copper in soil exceeds the Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland (1998) Human Health-based Investigation Levels (HIL) for commercial and industrial land use; the maximum concentrations of lead and PCBs exceed the HIL for standard residential use; and the maximum concentrations of zinc, mercury and TPH exceed the Environmental Investigation Level (EIL). Further analysis of samples with elevated metals concentrations using the Toxicity Characteristic Leachate Procedure (TCLP) indicated that the metal impacted soil is suitable for disposal at landfill.

3.2 Groundwater Contamination

Metal impact was detected in groundwater across the site, with the highest concentrations present on the south-western portion of the site. TBT was also detected above relevant guidelines on the south-west of the site. Two rounds of groundwater sampling have been conducted. The initial sampling was conducted while the site was operational (waste water was still being irrigated at the location of Monitoring Well MW-1). The second sampling event was conducted approximately two weeks after the facility had ceased operation.

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Maximum concentrations of contaminants detected in groundwater for the two sampling events were:

| | 26-03-08 | 9-07-08 |
|----------|-----------|------------|
| Copper | 9500 µg/L | 298 µg/L |
| Lead | 394 µg/L | 9 µg/L |
| Zinc | 4740 µg/L | 3960 µg/L |
| Cadmium | 1.6 µg/L | 1.1 µg/L |
| Chromium | 6 µg/L | 5 µg/L |
| Nickel | 32 µg/L | 3 µg/L |
| TBT | - | 0.054 µg/L |

The maximum metals and TBT concentrations exceed the Australian and New Zealand Environment and Conservation Council (ANZECC) National Water Quality Management Strategy (NWQMS) trigger values for the protection of 95% of species in marine water (2000) which are considered the most relevant guidelines due to the proximity of the tidal creek. The maximum contaminant concentrations detected during the second sampling event were less than those detected in the initial sampling event. However, only the nickel concentrations had reduced to a level below the ANZECC trigger value.

3.3 Off-site Contamination

Elevated soil copper, zinc and mercury concentrations above EPA EIL are present off-site to the south in sediments at the base of the boat ramp and to the west of the ramp along the foreshore of Biggera Creek. The presence of elevated copper, lead and zinc concentrations in a well located adjacent to the southern property boundary indicates that off-site migration of groundwater metal impact is likely.

3.4 Radiological Investigation

A Radiological Investigation was conducted by Queensland Health on the unsealed portions of the site to investigate the possibility of elevated radiation arising from abrasive blasting material. This investigation detected elevated surface gamma radiation levels (above Radiation Health guidelines for permanent occupancy where the contaminating practice has continued since 2002) in shallow soil south of the concrete driveway adjacent to the workshop and north-east of concrete adjoining the spray booth. Analysis of samples from each location confirmed the presence of enhanced radioactivity. TCLP testing of the sample with the greatest activity concentration detected a concentration which indicates that the soil is suitable for disposal to landfill without restriction.

4 ENVIRONMENTAL GUIDELINES

Remediation undertaken on site must be performed in accordance with the following documents:

- Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland, May 1998 and Hydrocarbon Guidelines issued as an amendment (1999);

- Guidelines issued under Schedule B of the National Environment Protection (Assessment of Site Contamination) Measure (NEPM), National Environment Protection Council, December 1999;
- Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (ANZECC guidelines) published by the Australian and New Zealand Environment and Conservation Council/National Health and Medical Research Council, January 1992;
- Australian Standard AS4482.1-2005 Guide to the sampling and investigation of potentially contaminated soil Part 1 - Non volatile and semi volatile compounds; and
- Australian Standard AS 4482.2-1999 Guide to the sampling and investigation of potentially contaminated soil Part 1 - Volatile and semi volatile compounds.

5 REMEDIATION GOALS AND STRATEGIES

5.1 Remediation Goals

Remediation goals have been based on the Environmental Investigation Levels (EIL) included in the Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland (1998) and the Draft Hydrocarbon Guidelines (1999) due to the proximity of the sensitive environmental receptor of Biggera Creek and the aim to apply for removal of the site from the EPA EMR. Remediation goals for metals, TPH and PCBs are described in Table 1.

Table 1: Soil Remediation Goals

| Compound | Remediation Criteria (mg/kg) |
|--------------------------------------|------------------------------|
| Copper | 60 |
| Lead | 300 |
| Zinc | 200 |
| Mercury | 1 |
| Total Petroleum Hydrocarbons | 1000 |
| TPH C ₆ -C ₉ | 100 |
| TPH C ₁₀ -C ₁₄ | 100 |
| TPH C ₁₅ -C ₂₈ | 1000 |
| TPH C ₂₉ -C ₃₆ | 1000 |
| PCB | 1 |

Remediation goals have been based on the trigger values for the protection of 95% of species in marine water (2000) included in the ANZECC guidelines 2000 as these are considered the most relevant guidelines due to the proximity of the tidal creek. Remediation goals for metals and TBT in groundwater are described in Table 2. Compliance with these goals will ensure that the remediated groundwater does not pose a risk to human health or the environment.

Table 2: Groundwater Remediation Goals

| Compound | Remediation Criteria (µg/L) |
|-----------------|-----------------------------|
| Copper | 1.3 |
| Lead | 4.4 |
| Zinc | 15 |
| Cadmium | 0.7 |
| Chromium (CrVI) | 4.4 |

Nickel
TBT

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0.006

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Soil excavated from the site will be separated into material suitable for unlined and lined landfill disposal based on analytical results and landfill license requirements.

5.2 Suitably Qualified Person to Conduct / Supervise Works

A person qualified in accordance with Sections 381 and 395 of the *Environmental Protection Act 1994* (EP Act) must conduct all investigations, supervise all remediation works and compile report/s required to validate the site.

5.3 Strategies Applied

Prior to the works commencing, a site-specific Health & Safety Plan will be prepared by the environmental consultant detailing precautions pertaining to protecting the health and safety of workers and the public surrounding the site during remediation of contamination.

During the remediation process, impacted soil will be excavated and separated into soil suitable for lined or unlined landfill disposal based on contaminant concentrations. In addition, impacted silty sand along the foreshore of Biggera Creek and in adjacent parkland to the south will be excavated (with the site owners' permission) for landfill disposal. Upon reaching the planned excavation depth (based on investigation results), validation samples will be obtained from the excavation base and walls for analysis of contaminants of concern. Analytical results for validation samples will be compared to the Soil Remediation Goals defined in Table 1 of this RAP. Any soil with contaminant concentrations exceeding the remediation goals will be further excavated for off-site disposal and the excavation boundary re-sampled for validation. This process will be undertaken until remediation goals are met.

The existing wells will be destroyed during soil excavation works. Therefore, following the excavation of impacted soil and backfilling with clean fill, new groundwater monitoring wells will be installed on site. These wells will be sampled and analysed to ascertain concentrations of contaminants of concern within groundwater. Results will be compared to the Groundwater Remediation Goals defined in Table 2 of this RAP. Dependent upon results, a groundwater remediation system may be installed to extract and filter groundwater (to remove metals) before returning groundwater to the aquifer. Alternatively, if concentrations are sufficiently low, but above the groundwater remediation goals, a site-specific risk assessment may be conducted to ascertain whether residual contaminant concentrations present a risk to human health or the environment without further remediation.

5.4 Permitting

A Development Application has been lodged with Gold Coast City Council (GCCC) and as part of the Operational Works Approval application, an Erosion & Sediment Control Plan will be submitted to GCCC for approval. If required, stormwater will be discharged from the site to the local stormwater system via a sedimentation pond with GCCC approval, subject to sampling and analysis of the water.

Prior to remediation works commencing, an application to the Third Party Reviewer (TPR) and EPA will be made for soil disposal permits for the transfer of soil contaminated with metals, TPH and PCBs from the site to licensed unlined or lined landfills, based on soil contaminant concentrations.

6 REMEDIATION PROGRAM

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6.1 Soil Remediation Overview

Remediation of soil contamination must be carried out as follows:

- Excavation of all contaminated soil as identified in the previous investigations including the adjacent parkland and Biggera Creek foreshore to the south of the site;
- Off-site disposal of the contaminated soil under an EPA issued *Disposal Permit* reviewed by the TPR;
- Validation of excavation boundaries (base and walls); and

6.2 Soil Remediation Methodology

The basic approach to the remediation of excavating soil and transporting it to landfill was selected based on the following reasons:

- Removal of all impacted soil off-site removes the ongoing source of contamination to groundwater during percolation of rainwater – this is particularly pertinent considering the close proximity of Biggera Creek; and
- Removal of the entire upper layer of soil reduces the risk of localised areas of contamination being missed in the validation program.

6.3 On-site Soil Excavation

The excavation depth and landfill disposal locations (lined vs unlined) for different areas of the site will be based on previous investigation results. Soil destined for lined landfill disposal will be excavated and transported off-site in the initial stage of excavation, followed by the widespread excavation of soil for unlined landfill excavation. The excavation works will be supervised by a suitably qualified person in accordance with Section 381 of the EP Act who will be equipped with the three reports detailed in Section 2.3 and this RAP.

Once soil excavation is complete, validation sampling will be conducted on the base and walls of the excavations as described in the validation section of this RAP (Section 8). Additional soil will be excavated and disposed of to an appropriate landfill if any validation sample fails the remediation criteria. Following validation, excavations will be backfilled with certified clean fill to return the site to grade and provide a foundation for building construction for the new development.

6.4 Off-site Soil Excavation

The proposed off-site excavation depth and appropriate landfill disposal locations (lined vs unlined) will be based on previous investigation results. Impacted soil in adjacent parkland and along the accessible sections of the Biggera Creek foreshore will be excavated for off-site disposal to landfill (assuming the land owners' permission is received). The excavation works will be supervised by a suitably qualified person in accordance with Section 381 of the EP Act who will be equipped with the three reports detailed in Section 2.3 and this RAP.

Excavation of off-site areas will occur prior to on-site excavation work to provide sufficient area for excavation machinery to manoeuvre. The excavation period will be scheduled to coincide with low tide to reduce siltation of water in the creek. Clean sand fill will be stockpiled on site prior to

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excavation to be utilised as clean backfill immediately after excavation and validation sampling to reduce the period of disturbance to the creek environment and public land.

6.5 Off-Site Disposal of Contaminated Soil

Off-site disposal of contaminated soil must be carried out in accordance with the conditions of a Section 424 Disposal Permit, granted under the EP Act 1994. Contaminated soil must not be removed off-site without a disposal permit. An application for disposal permit must be accompanied by a sampling plan and results clearly indicating the soil intended for removal. The application must be agreed and approved by the TPR prior to submission to the EPA for issue.

Suitable disposal locations for excavated soil will be determined on the basis of total contaminant concentrations and TCLP results (where applicable) compared to relevant lined and unlined landfill acceptance criteria. Soil will be transported to the landfill in licensed covered trucks. All truck drivers will carry a copy of the relevant soil disposal permit. Records of truck license plates, approximate volumes and destination of soil will be kept by the environmental consultant to allow estimation of volumes removed from the site to compare to landfill weighbridge dockets and ensure that the volume of soil removed does not exceed that allowed in the permit. If during excavation, the volume of soil approaches the amount estimated on the soil disposal permit, the consultant will notify the TPR and EPA and apply for an extension to the permit.

6.6 Imported Fill

Imported fill material will be certified clean fill sourced from a licensed quarry. If quarry material is not available, clean imported fill must be sampled and appropriately analysed at a rate of approximately one sample per 100m³ in order to determine its suitability for use on site and to ensure that the material being imported does not contain elevated concentrations of compounds which may affect the suitability of the site to be removed from the EMR. The frequency of sampling and the list of analytes will be the TPR depending on the source of the material. This material must meet remediation goals identified in Table 1 of this RAP.

6.7 Groundwater Remediation

As presented in Section 3.2, groundwater contamination concentrations reduced significantly after the facility had ceased operation, most likely due to the cessation of waste water irrigation on site. Once contaminated surface soil has been removed from the site, the ongoing source of impact to groundwater will have been removed and concentrations of contaminants are expected to decrease further.

Following soil excavation and backfilling, five new groundwater monitoring wells will be installed in approximately the same location as existing wells which will be destroyed during soil excavation. Wells will be gauged and level surveyed to ascertain whether the direction of groundwater flow remains towards the south-west as estimated during the previous investigations. Wells will be sampled and groundwater will be analysed to ascertain concentrations of contaminants of concern. Results will be compared to the Groundwater Remediation Goals.

Dependent upon results, a groundwater remediation system may be installed to extract and filter groundwater (to remove metals) before returning groundwater to the aquifer. Alternatively, if concentrations are sufficiently low, but above the groundwater remediation goals, a site-specific risk assessment may be conducted to ascertain whether residual contaminant concentrations present a risk to human health or the environment without further remediation. The remediation strategy will be presented to the TPR and agreed upon prior to work commencing. Groundwater remediation will continue until contaminant concentrations either meet the groundwater remediation goals or can be shown to present no significant risk to human health or the environment.

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6.8 Remedial Works Implementation Timeframes

A detailed program will be developed to demonstrate the critical path to complete the site establishment, remediation of the site including on and off-site excavation and stockpiling, validation sampling, removal of contaminated soil to landfill, groundwater investigation, groundwater remediation/risk assessment and reporting. Once approvals are obtained and concrete slabs and buildings are removed, the time to complete the excavation and off-site disposal of the shallow contaminated soil would be less two weeks (weather permitting) with the length of time required for groundwater remediation dependent on contaminant concentrations.

7 ENVIRONMENTAL & OPERATIONAL MANAGEMENT CONTROL

The remediation program must be conducted with all due regard to the environment and to statutory requirements. The site's location in a residential area and adjacent to Biggera Creek means that every effort must be made to minimise impacts to neighbours and the waterway.

The owner must ensure that the earthmoving contractor's site manager is conversant with the contents of the RAP and Health and Safety (H&S) Plan. Additionally they will ensure that each employee or subcontractor involved with remediation is inducted into the requirements of the RAP and H&S Plan prior to the commencement of work. In particular, in addition to any statutory compliances required, the contractor will be responsible for conducting remediation works with all due care to ensure compliance with conditions described below.

7.1 Control of Stormwater Run-off

Remediation works must comply with requirements for stormwater management as outlined in Schedule B(9) of the NEPM 1999 Guidelines. This includes stockpiling excavated soil/fill in a manner that prevents contamination from being transported off-site by stormwater. The contractor must control surface waters on the site as follows:

- Divert clean stormwater run-off outside the site so that it does not flow through the site;
- Control drainage on site by intercepting and redirecting run-off in a controlled manner;
- Water containing any suspended matter or contaminants must be managed within the site in such a manner to minimise pollution of adjacent sites and waterways;
- Any stormwater collected from the site in the open excavation will be appropriately managed; and
- Silt fences will be erected at locations where stormwater may flow from the site.

GCCC approval must be sought prior to discharge of contaminated water from the site to either sewer or stormwater. Procedures such as pumping discharge water through hay bales or a silt fence will be required to reduce sediment load before discharge. Water collected in excavations in contact with contaminated soil must be sampled and analysed for the analytes discussed in Section 5 to determine a suitable disposal option.

7.2 Control of Soil and Sediment

Requirements for the management of sediment and soil described in Schedule B(9) of the NEPM 1999 Guidelines (from which the above control measures are drawn) must be complied with during remedial works. Sediment released to surface waters must be minimised by the use of sediment controls such as diversion drains, hay bales and silt fencing. In particular, a silt fence or hay bale

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bunding must be located around the perimeter of temporary stockpiles of excavated soil or imported fill material. If adverse weather conditions are anticipated, stockpiles must be covered.

Any plant or equipment that handles contaminated soils must be inspected prior to leaving the site, and cleaned as necessary. Vehicles must be controlled so that minimal mud, soil or water will fall or be deposited on any public or private roadway or adjacent areas. The ingress/egress point through which trucks exit the site with soil to landfill will be fitted with a rumble strip to facilitate removal of soil and mud from tyres prior to leaving the site. The roadway outside the site must be frequently inspected and swept as necessary to keep the area free of loose soil.

7.3 Control of Noise

Noise levels must comply with GCCC and EPA requirements. The contractor will keep noise levels to a minimum and levels will not exceed limits indicated in AS 2436-1981. In addition, normal working hours will be employed during soil excavation and loading for off-site transportation to avoid complaints relating to noise i.e. 7.00 am to 6.00 pm Monday to Friday and 7.00 am to 2.00 pm Saturday. Truck movements onto Stradbroke Street during soil excavation and transportation will be relatively short in duration and are unlikely to impact the general circulation of traffic in the area or create excessive noise.

7.4 Control of Dust

Based on previous investigations on site, the soil to be excavated is likely to be slightly moist and minimal air-borne dust is expected to be generated. In the event of dust generation or a dust complaint, mitigation measures such as watering and covering of temporary stockpiles must be used. Truck loads being transported to landfill must be covered before leaving site.

Water used for dust suppression will not be allowed to escape off-site by the stormwater system, sewer, or any other means. Compliance with Schedule B (9) of the NEPM 1999 Guidelines, must be achieved, which is in addition to GCCC and EPA requirements.

7.5 Odour Control

Based on the identified contaminants of concern, the level of odour generated during remedial activities is not expected to be a concern. However, in the unlikely event that odorous compounds are encountered, the contractor under the supervision of the person qualified in accordance with Section 5.2 shall take all precautions to ensure that no obnoxious odours migrate from the site boundaries. To minimise odours if encountered, only small volumes of the material must be excavated at any one time. Any fill containing significant quantities of odorous compounds must be placed in a banded area and covered with plastic sheeting and sprayed with an odour suppressant as soon as possible.

7.6 Communications and Complaints Register

Immediate neighbouring residents will be notified by way of letter drop of the remediation works to be conducted including a brief description of works, timing and contact details for the environmental consultant for any queries or complaints. In addition, signage will be posted on the site fence indicating contact details. A public complaints register will be established prior to the commencement of the remedial works, to address any issues that may arise in the community as a result of works on the site. Rapid, pro-active response to any complaints received will be provided within one working day of receipt of the complaint. The TPR and EPA will also be notified of any complaints within two working days.

8 VALIDATION

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8.1 Soil Validation

Validation sampling will be conducted to document the contamination concentrations at the lateral and vertical extent of all excavations. The following sampling guide has been compiled to fulfil the requirements of Australian Standard AS4482.1 Guide to the Sampling and Investigation of Potentially Contaminated Soil Part 1: Non Volatile and Semi-Volatile Compounds. Soil samples will be collected on the following basis:

- Targeted soil samples obtained beneath where impact was previously detected and analysed for the same contaminants (selected metals, TPH and PCB) which were elevated in the shallow soil removed above;
- Grid samples obtained across the remainder of the base of the excavations at a rate of one sample collected per ten metre grid and analysed for a suite of metals and selectively for TPH and TBT;
- Samples obtained from the walls of excavations at a rate of one sample per 25m² of wall surface and analysed for a suite of metals; and

Samples will be submitted to a National Association of Testing Authorities (NATA) accredited laboratory for analytical analyses in question be used. Should this be not the case, appropriate laboratory QA/QC will be required. Note that TBT was not identified to be a soil contamination issue in the previous investigations, nevertheless, validation of the excavations will include analysis for TBT based on the former site use.

Where contaminant concentrations in validation samples exceed the remediation goals, further excavation and validation sampling must be conducted until the site is remediated to a level within the remediation goals. The extent of excavation off-site to the south will be agreed upon with the site owner (GCCC).

In addition to validation of the removal of contamination, a radiological investigation must be conducted across the excavated area by personnel whose qualifications and experience meet the criteria in the EP Act and are deemed acceptable by Queensland Health Radiation Health Unit. If any areas of elevated radiation activity are detected, the area will be excavated further until no elevated radiation remains on site. The investigation and validation report/s must be submitted via the Administering Authority for final assessment by Queensland Health Radiation Health Unit.

8.2 Groundwater Validation

Samples will be obtained from wells installed after impacted soil removal and selectively analysed for contaminants of concern: metals, TPH, PCB and TBT; and physicochemical parameters. Sufficient sampling and analysis events will be conducted to provide data upon which to base a site specific risk assessment, including fate and transport modelling. If contaminant concentrations are shown to present an unacceptable risk to human health or the environment, remediation of groundwater will be conducted with installation of a water treatment system. Water samples will be obtained from the inlet and outlet (before re-injection into the groundwater table) of the water treatment system to determine if remedial goals are being met. Re-sampling and analysis of wells will be required to validate the remediation of groundwater.

8.3 Sample Dispatch and Documentation

Samples must be collected in the appropriate containers and labelled to identify their origins as described by AS4482.1-2005 and dispatched to the laboratory for analysis within 48 hours of collection. Samples will be preserved by storing them immediately after collection on ice and transferring them in a chilled condition to the laboratory. Chain of Custody documentation and handling must be performed in accordance with the Australian Standard AS4482.1-2005 and the NEPM guidelines. Sample Receipt Advice documentation must be submitted in the validation report along with Chain of Custody documents.

8.4 Quality Assurance/Quality Control (QA/QC) Program

A field QA/QC program must be conducted in accordance with the NEPM, Australian Standard AS4482.1-2005 and EPA recommendations, to measure the precision of the field/laboratory analyses and to determine the accuracy of the primary laboratory's analyses.

The following categories of QA/QC samples will be included in the analytical schedule:

- Duplicate soil samples - collected and analysed by the primary laboratory at a rate of one duplicate per twenty soil samples;
- Triplicate soil samples - collected and analysed by a secondary laboratory at a rate of one duplicate per twenty soil samples; Rinsate samples – non-disposable sampling equipment which has undergone standard decontamination procedures will be rinsed between collection of samples and the rinsate will be submitted for analysis of contaminants of interest. One rinsate will be obtained per day of fieldwork; and
- Trip blanks a deionised water sample will be placed in the eskie with samples to determine whether any cross contamination has occurred during storage of samples and delivery to the laboratory. One trip blank will be obtained per batch of samples submitted to the laboratory.

9 DECONTAMINATION PROCEDURES

Decontamination procedures for sampling equipment must be in accordance with the Australian Standard AS 4482.1-2005 and the NEPM guidelines (Schedule B (9)). Non-disposable sampling equipment will be decontaminated between sample collection. Where equipment such as disposable bailers or gloves are used, the risk of cross-contamination will be avoided by using a new bailer for sampling of each groundwater monitoring well and new gloves between collection of soil samples.

10 HEALTH AND SAFETY

A site-specific *Health and Safety Plan* must be prepared for the activities to be performed on the site where employees may be exposed to toxic or other hazardous compounds and elements. Specific requirements relating to dermal contact and inhalation as well as public safety, vehicle decontamination, protective clothing, equipment and appropriate safety controls must be addressed. Personnel working on the site must read and understand the Health and Safety Plan. All staff working on the site during remediation works must be inducted and sign relevant forms stating that induction has been carried out.

11 REPORTING REQUIREMENTS

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The progress of the works will be reported to the TPR on a regular basis. Validation sampling results will be supplied to the TPR in the form of letter reports as the data becomes available.

Within 60 days of the completion of all remediation and validation works, a report detailing works must be prepared by a suitably qualified person in accordance with Section 5.2 of the EP Act and submitted to the TPR prior to approval and subsequent submission to the EPA. The report must be in accordance with Chapter 7, Part 8 of the Environmental Protection Act 1994 and the *Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland* May (1998).

The report must include but not be limited to the documentation of the remediation works and validation program activities and an evaluation of the results against the remediation criteria as stated in Section 4 and will include the results of any further excavation and / or validation, which may have been required after the results of the initial validation testing.

The report will also include the results of the QA/QC program, Chain of Custody documentation and Sample Receipt Advices for all samples collected and copies of documentation validating the appropriate handling, disposal and treatment of any contaminated soil and water in accordance with EPA requirements.

12 STATEMENT OF SUITABILITY

Prior to the commencement of the proposed new land use, a statement of suitability must be obtained from the EPA. The Statement of Suitability must specify that the site is suitable for the intended use(s) and the site can be removed from the EMR or the site is to remain on the EMR and will be managed under an SMP.

13 THIRD PARTY REVIEW (TPR)

The site work and subsequent report is to be certified by an EPA appointed TPR. All validation requirements will first be confirmed by the TPR and any clarification issues will be referred to the TPR prior to the EPA. The TPR will review the RAP, proposed validation methodology, pre-validation sampling results, surface and groundwater results, Disposal Permit applications and the final validation report.

The role of the TPR is to review all relevant documentation associated with the proposed RAP, to accept the proposed remediation strategy and recommend that the site is suitable for any land use or specific land uses (if necessary) in accordance with EPA Guidelines for Third Party Review dated 15 February 2008.

REFERENCES

Department of Environment (Queensland Environmental Protection Agency) May 1998 *Draft Guidelines for the Assessment and Management of Contaminated Land in Queensland*;

QLD EPA (1999). *Draft Hydrocarbon Guidelines*. Queensland Environmental Protection Agency, Brisbane.

National Environment Protection Council (1999), *National Environment Protection (Assessment of Site Contamination) Measure Schedule B (2) Guideline on Data Collection, Sample Design and Reporting*;

QLD EPA (2008). Third Party Reviewer Terms of Reference;

MV.

Standards Association Australia (2005), *AS4482.1 Guide to the sampling and investigation of potentially contaminated soil, Part 1: Non-volatile and semi-volatile compounds;*

Standards Association Australia (2005), *AS4482.2 Guide to the sampling and investigation of potentially contaminated soil, Part 1: Volatile substances; and.*

Published on DES Disclosure Log
RTI Act 2009



ANNEXURE 1 - SITE MANAGEMENT PLAN

LOT : 1 PLAN : RP134828 FILE REF : BNE35268 PRINTED: 24/03/2014

DATE OF EFFECT : 06/02/2009

1.0 SUMMARY OF CONTAMINATION

The site is located at 71 Stradbroke Street, Runaway Bay in Queensland. The site, encompassing 1,831m², was utilised as a boat repair and maintenance facility. Potentially contaminating activities associated with the boat repair and maintenance facility which operated from 1958 to June 2008 include spray painting, high pressure cleaning, abrasive blasting and chemical storage. Other potential sources of contamination include imported fill on the south-western portion of the site and asbestos roofing material used on the boat repair workshop. Refer to the attached figure 1.

The maximum concentrations of contaminants detected in the soil samples analysed were:

| | |
|--|-------------|
| Copper | 16700 mg/kg |
| Lead | 2360 mg/kg |
| Zinc | 4700 mg/kg |
| Mercury | 7.2 mg/kg |
| Total petroleum hydrocarbons (C10-C14) | 240mg/kg |
| Total petroleum hydrocarbons (C15-C28) | 1020 mg/kg |
| Total petroleum hydrocarbons (C6-C36) | 2000 mg/kg |
| PCBs | 22.4 mg/kg |

The maximum concentrations of contaminants detected in the groundwater samples analysed were:

| | |
|----------|------------|
| Copper | 9500 ?g/L |
| Lead | 394 ?g/L |
| Zinc | 4740 ?g/L |
| Cadmium | 1.6 ?g/L |
| Chromium | 6 ?g/L |
| Nickel | 32 ?g/L |
| TBT | 0.054 ?g/L |

A Radiological Investigation was conducted on the unsealed portions of the site. This resulted in detection of elevated surface gamma radiation levels (above Radiation Health guidelines for permanent occupancy) TCLP analysis of the sample with the greatest activity concentration detected a concentration which indicates that the soil is suitable for disposal to landfill without restriction.

2.0 OBJECTIVES OF SMP

The purpose of this SMP is to manage contamination on the site in a manner that protects human health and the environment. This SMP will provide interim management recommendations until an acceptable level of remediation and validation has been completed following the implementation of the Remediation Action Plan

(RAP) for the site which forms part of this SMP (refer to Appendix 1). Following remediation work, either application will be made to remove the site from the EMR or a revised SMP will be prepared.

3.0 ACHIEVEMENT AND MAINTENANCE OF OBJECTIVES

3.1 Responsibility. The owner of the land, defined in the Environmental Protection Act 1994 (EP Act) is to ensure that this SMP and any variations approved or required by the administering authority are complied with. The obligations and conditions set out in this SMP bind the owner, from time to time, of the land.

3.2 Third Party Reviewer. A Third Party reviewer (TPR) approved by the Environmental Protection Authority (EPA) and operating in accordance with the EPA's Terms of Reference for TPR (February 2008) must be appointed for the duration of the site assessment and remediation.

3.3 Site Use. The site is currently vacant and access by the public should be restricted during implementation of the attached RAP and until the remedial action is deemed successful (by the EPA/ Third Party Reviewer (TPR) or relevant authority).

3.4 Provision of SMP to Appropriate Persons. The owner must provide all persons involved in building design and planning and all contractors and lessees conducting building and/or excavation works with a copy of the SMP prior to commencement of works. All persons occupying or working on the site must comply with the requirements of the SMP.

3.5 Site Capping. The site currently has buildings and a concrete slab over the majority of the site. These capping materials must remain in place in sound condition, until the remediation process commences.

3.6 Soil Excavation & Removal. Extensive excavations are proposed across the site in accordance with the RAP. All excavated impacted material will be removed off-site to a licenced landfill in accordance with the landfill's soil acceptance criteria.

Representative sampling and analysis of soil from excavation boundaries in contaminated areas must be managed by a suitably qualified and experienced person in accordance with Section 381 of the EP Act. Contaminated soil must not be removed off-site without a disposal permit in accordance with Section 424 of the EP Act.

3.7 Unexpected Contamination. If during any site earthworks or excavation, offensive or noxious odours and/or evidence of gross contamination not previously detected is observed, site works are to cease in that area and action taken to immediately abate the environmental harm. The administering authority is to be notified in writing within two (2) business days of detection and advised of appropriate remedial action.

Any remediation plan is to be developed by an appropriately qualified and experienced person in accordance with Section 381 of the EP Act and certified by the TPR.

3.8 General Environmental Protection. All earthworks are to be undertaken in accordance with general environmental protection measures to avoid unwanted migration and deposition of soil. These measures include the control of dust, noise, stormwater or sediment runoff, erosion, spillage from haulage trucks and odour releases involving the handling or movement of contaminated material.

3.9 Workplace Health and Safety. A Workplace Health and Safety Plan (WH&S plan), which conforms to

the requirements of the *Workplace Health and Safety Act 1995* is to be developed for any excavation works at the site. The WH&S plan must address site-specific contaminants of concern identified in Section 1.0 of this SMP.

3.10 Underground Services. Where underground service trenches are constructed in contaminated areas, the trenches must be surrounded by a minimum of 0.3m of uncontaminated fill for minor services (<100mm in diameter), and 0.5m of uncontaminated fill for services greater than 100mm in diameter, to protect future maintenance workers from contact with potentially contaminated fill material. Clean fill must also be placed above any services through to the surface of the Site to allow access to services while protecting maintenance workers.

3.11 Imported Fill Material. Any fill material that may be imported to the site in the future (other than from a recognised quarry source), must be sampled and submitted for analysis by an appropriately qualified and experienced person prior to delivery to the site. The frequency of the sampling and analysis required, and the acceptance criteria adopted for potential contaminants will depend on the source of the fill. A report documenting the contamination status of the imported fill must be submitted to the TPR or TPR and Administering Authority for approval prior to commencement of construction works at the site.

4.0 MONITORING AND REPORTING

Records are to be kept of all inspections, any soil excavation in contaminated areas, disposal permits and site management plan compliance for review by the administering authority from time to time. A biennial inspection is to be undertaken to ensure that capping and protective barriers remain in sound condition at all times in accordance with section 3.4.

The biennial period is to commence from the effective date of this plan.

This SMP has been developed to manage site contamination risks present at the issue date. Subsequent uses of the site may result in the need to review the plan.

This SMP makes reference to plan attachments that are available from the administering authority if required.

This SMP makes reference to an appendix titled Remediation Action Plan (RAP) that is available the administering authority if required.



SARA technical agency assessment response

Technical agency (TA) — EHP, Waste & Land Contamination Assessment

DSDIP reference: SDA-0214-008405
 DSDIP Role: referral agency
 DSDIP regional office: SARA SEQ South-GoldCoast
 DSDIP email: GCSARA@dsdip.qld.gov.au
 [NB. All responses are to be returned to this email address]
 BNE35268

TA reference:
 TA contact name: Helen Bankes
 TA contact details: Phone: (07) 3330 5616 Email: helen.bankes@ehp.qld.gov.au
 TA approver: David Cook

1.0 Application details

Street address: 71, 73, 75 and 75A Stradbroke Street, Runaway Bay
 Real property description: Lot 1 & 2 on RP166656 and Lot 1 & 2 on RP134828
 Local government area: Gold Coast City
 Applicant name: Ali Holdings #1 Pty Ltd c/- Cardno HRP

2.0 Aspects of development and type of approval being sought

| Nature of Development | Approval Type | Brief Description of Proposal | Level of Assessment |
|------------------------|--------------------|--|---------------------|
| Material Change of Use | Development permit | Apartment x 66 dwelling units, estate sales office and display home. | Impact Assessment |

3.0 Matters of interest to the state

The development application has the following matters of interest to the state under the following provisions of the Sustainable Planning Regulation 2009¹:

Schedule 7 Referral agencies and their jurisdictions — matters of interest specific to technical agency

| Trigger ID | Description | Technical Agency |
|------------|---|------------------|
| 7.2.23 | A material change of use made assessable under schedule 3, part 1, table 2, item 6 or 7 | EHP |

¹ MyDAS does not collect data on assessable development aspects under Schedule 3—this is a matter confirmed by DSDIP during the validation process.

4.0 Assessment

4.1 Considerations and assessment

Details of contaminated land trigger

- Lot 1 on RP134828 is on the EMR for Notifiable Activity 1 - ABRASIVE BLASTING as a MANAGED SITE in accordance with Chapter 7, Part 8 of the Environmental Protection Act 1994.
- A Site Managed Plan (SMP) with attached Remediation Action Plan (RAP) was approved over the site on 06/02/2009.
 - The SMP states that 'the site is currently vacant and access by the public should be restricted during implementation of the attached RAP and until the remedial action is deemed successful (by the EPA/ Third Party Reviewer (TPR) or relevant authority)'.
 - The purpose of the RAP is to provide an outline of activities, procedures and objectives to ensure effective and controlled remediation of the site prior to the proposed residential development.

Proposal details

- The subject MCU proposal is for the development of a residential apartment building (66 dwelling units), estate office and display unit.
- The site is currently is currently occupied by 3 detached dwellings (Lot 1 & 2 on RP166656 and Lot 2 on RP134828) and waterfront industry land use – former boat repair and maintenance facility (Lot 1 on RP134828).

Potential risks to human health and the environment with regard to contaminated land

- The proposed use is deemed to be consistent with the approved SMP / RAP over the site.
- It is considered that the below recommended conditions are sufficient to manage any potential risks of harm to human health and the environment associated with contaminated land issues at the site in relation to the subject proposal. **As such, the proposal is deemed to meet SDAP Module 12, PO1, under the below recommended conditions.**

1.0 Recommendations.

1.1 Technical agency advice for SARA as concurrence agency

Our department:

- (a) recommends the following conditions be attached to any development approval (SPA section 287(1)(a)):

| No. | Conditions of development approval | Condition timing |
|-----|---|------------------|
| 1. | At all times while the use continues and the subject land is on the Environmental Management Register (EMR) the applicant must comply with the approved Site Management Plan (SMP) and Remediation Action Plan (RAP) for Lot 1 on RP134828 issued under the Environmental Protection Act 1994 by the Department of Environment and Heritage Protection. | At all times |

- (i) The reasons for the inclusion of these conditions are:
- The conditions for this proposed development that are contained within this response are required to prevent or mitigate any potential risk to human health or the environment from possible hazardous contaminants present on the site.
- (A) Findings on material questions of fact:
- As the lot is on the EMR for Notifiable Activity 1 - ABRASIVE BLASTING, the premises constitutes a *potentially affected premises* in accordance with the Sustainable Planning Regulation 2009.
 - It is deemed that risks to human health and the environment as a result of the proposal can be adequately managed thorough the above mentioned conditions.
- (B) Evidence or other material on which the findings were based:
- Supporting information supplied with the subject application including:
 - i. Planning Assessment Report, prepared by Cardno HRP, dated February 2014.

1.2 Approved plans and specifications

Plans and specifications relied upon for this response are referred to in the advice or conditions supplied earlier in this response.

2.0 Endorsement

| | | | |
|----------|---|--|----------------|
| Officer | Helen Bankes 28 March 2014 | Environmental Officer sch4p4(6) Personal information | (07) 3330 5616 |
| Approver | David Cook sch4p4(6) Personal information | Manager 31/3/2014 | (07) 3330 5583 |

Date : 14/07/2017 4:48:28 PM

From : "SMOLKOVA-BISMARCK Angelina"

To : "mydas-notifications@qld.gov.au" , "alice.slark@dilgp.qld.gov.au"

Cc : "Industry and Development Assessment"

Subject : FW: SPD-0717-037673 Notice requesting legacy application records

Attachment : EDOCS-#5644868-v1-TA_REsponse_Changed_Approval.pdf;EDOCS-#5627174-v1-SARA_20170705_Change_to_DA_(relevant)_SPD-0717-037673_....docx;image001.png;image002.png;

Dear Ms Slark,

Please find attached EHP response to the above application.

Should you have any questions, please let me know.

Kind regards,

Angelina



Angelina S. Bismarck

Principal Environmental Officer

Waste and Contaminated Land | Industry & Development
Assessment

Department of Environment and Heritage Protection

P 07 3330 5681

Level 8, 400 George Street Brisbane Q 4000

PO Box 2554 GPO Brisbane Q

From: No Reply [<mailto:mydas-notifications@qld.gov.au>]

Sent: Wednesday, 5 July 2017 4:42 PM

To: Sara-EHP

Subject: SPD-0717-037673 Notice requesting legacy application records

05/07/2017

Our reference:

[SPD-0717-037673](#)

Application street address: 71 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 73 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 75 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 75A Stradbroke Street - Runaway Bay, Gold Coast City - QLD

Lot on Plan: 1; 2; 1; 2 RP134828; RP134828; RP166656; RP166656

DSDIP Role: referral agency

Lodged with council 30 June

5/07/2017 - sent to DEHP

Council reference: MCU201400077 (original) and MCU201700970 (this request)

Previous SARA reference: SDA-0214-008405

The Department of Infrastructure, Local Government and Planning has received a request for a permissible change from Be Glam Pty Ltd c/- Urbis Pty Ltd.

The department seeks your consideration of this request. You are asked to advise the department if your agency supports this request by 26/07/2017. The relevant technical agency response template is now available for download from the "Internal Documents" section of the application's dashboard.

If you require any further information or clarification, please contact Alice Slark, Senior Planning Officer, on 5644 3223 , or via email alice.slark@dilgp.qld.gov.au who will be pleased to assist.

Thank you for your assistance to date.

Regards

Alice Slark

SARA technical agency assessment response

Technical agency (TA)— Department of Environment and Heritage Protection

DSDIP reference: SPD-0717-037673
DSDIP Role: referral agency
DSDIP regional office: SARA SEQ South-Gold Coast
DSDIP email:

[NB. All responses are to be returned to this email address]

TA reference: SRCR00316114
TA contact name: Angelina Bismarck
TA contact details: Angelina.bismarck@ehp.qld.gov.au
TA approver: Kate Harbert

1.0 Application details

Street address: 71 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 73 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 75 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 75A Stradbroke Street - Runaway Bay, Gold Coast City - QLD

Lot on plan: 1; 2; 1; 2 RP134828; RP134828; RP166656; RP166656

Local government area: Gold Coast City, Gold Coast City, Gold Coast City, Gold Coast City

Applicant name: Be Glam Pty Ltd c/- Urbis Pty Ltd

Applicant contact details: sch4p4(6)@urbis.com.au

2.0 Aspects of development and type of approval granted

The original development application (DA) was approved by Council subject to Conditions on 19 December 2014 (Council reference: MCU201400077).

Of the four lots being the subject of this DA, one (Lot 1 on RP134828) is listed on the EHP's Environmental Management Register for a notifiable activity Abrasive Blasting with a Site Management Plan attached.

The proposal seeks to change the original Development Permit to adopt a revised set of plans, allowing for an increase in residential apartments to a total of 98 units (170 bedrooms total). Whilst the development proposes an increase in residential density, the development does not seek to substantially alter the built form of the original development. The proposal maintains the approved built form envelope and façade design, with density increases achieved primarily through the replanning of internal apartment layouts.

3.0 Matters of interest to the state

The development application has the following matters of interest to the state under the following provisions of the Sustainable Planning Regulation 2009¹:

Schedule 6 Assessment manager for development applications and Schedule 7 Referral agencies and their jurisdictions — matters of interest specific to technical agency

¹ MyDAS does not collect data on assessable development aspects under Schedule 3—this is a matter confirmed by DSDIP during the validation process.

4.0 Request by applicant to change development approval—relevant entity

- 4.1. The original development application was approved by Council subject to Conditions on 19 December 2014 (Council reference: MCU201400077).
- 4.2. DSDIP received a copy of a request from the applicant on 05 July 2017 under section 372 of the *Sustainable Planning Act 2009*. The applicant has made a written request to the responsible entity for a permissible change to the responsible entity's decision notice.
- 4.3. Our department:
- (a) has no objection to the change being made.

5.0 Endorsement

| | | | | |
|-----------------|--|---------------------------------------|-----------|---|
| Officer | Angelina S. Bismarck sch4p4(6) Personal inform 14/07/2017 | Principal Environmental Officer | 3330 5681 | angelina.smolkova- bismarck@ehp.qld.gov.au |
| Approver | Kate Harbert sch4p4(6) Personal inform | Manager (Assessment) | 3330 5656 | Kate.Harbert@ehp.qld.gov.au |

SARA technical agency assessment response

Technical agency (TA)— Department of Environment and Heritage Protection

DSDIP reference: SPD-0717-037673
DSDIP Role: referral agency
DSDIP regional office: SARA SEQ South-Gold Coast
DSDIP email:

[NB. All responses are to be returned to this email address]

TA reference: SRCR00316114
TA contact name: Angelina Bismarck
TA contact details: Angelina.bismarck@ehp.qld.gov.au
TA approver: Kate Harbert

1.0 Application details

Street address: 71 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 73 Stradbroke Street Runaway Bay, Gold Coast City - QLD; 75 Stradbroke Street - Runaway Bay, Gold Coast City - QLD; 75A Stradbroke Street - Runaway Bay, Gold Coast City - QLD
Lot on plan: 1; 2; 1; 2 RP134828; RP134828; RP166656; RP166656
Local government area: Gold Coast City, Gold Coast City, Gold Coast City, Gold Coast City
Applicant name: Be Glam Pty Ltd c/- Urbis Pty Ltd
Applicant contact details: sch4p4(6)@urbis.com.au

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- 4.3. Our department:
 - (a) has no objection to the change being made.

5.0 Endorsement

| | | | | |
|-----------------|----------------------|---------------------------------|-----------|---|
| Officer | Angelina S. Bismarck | Principal Environmental Officer | 3330 5681 | angelina.smolkova-bismarck@ehp.qld.gov.au |
| Approver | Kate Harbert | Manager (Assessment) | 3330 5656 | Kate.Harbert@ehp.qld.gov.au |