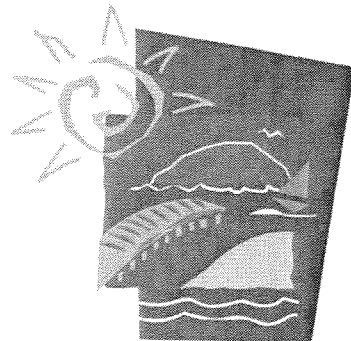


COFFS HARBOUR CITY COUNCIL



Our Ref: 1536721 (DA 337/07)

6 December 2006

Mr B Jenner
Attentus Projects and Properties
Level 3
225 Miller Street
NORTH SYDNEY NSW 2060

Dear Mr Jenner

**Review of Contamination Report (Past Agricultural Activities)
740-742 Pacific Highway, Sapphire Beach**

Reference is made to the above matter and in particular to correspondence of 27 November 2006 prepared by David Lane Associates.

This advice has been reviewed by Council's Health Section and it is advised that the report does not demonstrate compliance with the Environmental Protection Authority's *Guidelines for Assessing Banana Plantation Sites*. A report should be submitted, to include analytical reports, plan showing sampling locations, a complete explanation of methodologies to demonstrate compliance with the Guidelines.

It is recommended that Mr Lane discuss this matter directly with either Mr Paul Shepherd (telephone 026648.4674) or Mr Jeff Green (telephone 02 6648.4670) of Council's Health Section.

For further information on this matter please contact Mark Hannon on 6648.4631.

Yours faithfully

Mark Hannon
Acting Manager Land Use Assessment

MSH:sms

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- Website: www.coffsharbour.nsw.gov.au

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DAVID LANE ASSOCIATES
ABN 36 926 003 197
Environment Health Safety

27th November 2006

Mr Bill Jenner
Attentus Projects and Properties
Level 3
325 Miller Street
North Sydney
NSW 2060

Dear Sir

**Re: Review of Contamination from Past Agricultural Activities (Banana Growing)
740-742 Pacific Highway Coffs Harbour NSW.**

The NSW Department of Planning has received submissions regarding the future development of land identified as *Residential and Tourist Development (Sapphire Beach Resort) 740-742 Pacific Highway Coffs Harbour NSW*. A submission was received from Coffs Harbour City Council regarding the possible past land usage and the potential for contamination activities conducted on the Site. Coffs Harbour City Council recognised that the area of the proposed development had potential for banana growing to have been conducted in the past and therefore possible contamination from arsenic, lead and pesticides residues used extensively in banana cultivation.

We have reviewed Coffs Harbour City Council Policy and Guidelines for the environmental assessment of potential and past landuses associated with agricultural activities, more specifically banana growing. These include Councils *Agricultural Residue Policy* and reference to the NSW EPA document *Contaminated Sites "Guidelines for Assessing Banana Plantation Sites"*.

David Lane Associates conducted a Phase 1 Preliminary Site Environmental Assessment of the Site in March 2006 to outline the potential for contamination associated with past and present landuses. This study included historical research by way of aerial photographs etc. to determine any past landuses that may have impacted on the soil conditions. The historical review highlighted between 1954 and 1964 farmland (possible banana plantation) was evident in the western (upper) area of the Site with two (2) structures evident in the central area.

SYDNEY

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As a consequence of the review, and within the limitations of the Phase 1 Preliminary Environmental Assessment, David Lane Associates included appropriate sampling to identify potential impacts. Contaminants of Concern such as arsenic, lead and pesticides (dieldrin, aldrin DDT etc) were included in the analytical suite.

The Preliminary Environments Assessment contained three (3) sample locations within the western area with two (2) specifically in the northern portion of the western area. These were identified as BH1, BH4 and HS1, BH1 and HS1 being in the northern area.

The analytical results from these sample locations are included in the Table below:

Date	Sample Location	Contaminant mg/kg				
		Arsenic	Lead	Dieldrin	Aldrin	DDT
06-03-06	BH1-0.1	20	57	0.2	<0.1	<0.1
06-03-06	BH4-0.5	9	19	-	-	-
06-03-06	HS1-0.1	24	41	<0.1	<0.1	<0.1
Acceptance Criteria		100	300	10	10	50

Acceptance Criteria – Table B NSW EPA Contaminated Sites Guidelines for Assessing Banana Plantation Sites 2003.

The results obtained from the preliminary environmental assessment indicate compliance with the requirements for disturbed terrains associated with past banana growing activities. As such David Lane Associates concluded that the land was suitable for its intended use to a level consistent with Table 5a NEPM 1999 Column A *Residential with Gardens and Accessible Soils*.

If you have any questions regarding the above please do not hesitate to contact us.

Yours Faithfully

DAVID LANE ASSOCIATES



David Lane
Director.