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Attention: Ross Closter Bacchus Marsh Property Group Pty. Ltd. PO Box 4298 GEELONG Vic 3220

20 March 2020

Dear Ross,

## Re: Review EllA Hopetoun Park North

As instructed, we have undertaken a brief desktop study to provide preliminary advice on the potential for land to the north of the Hopetoun Park growth area indicated within an Extractive Industry Interest Area to be developed for extractive industry purposes.

It is our overall opinion that the likelihood of establishing a feasible quarry site is very low considering the factors affecting the site as outlined below.

We have sourced information from the Geovic database and also both Melbourne Supply Area - Extractive Industry Interest Area reports (1996 & 2003). Attached are maps displaying some of the more pertinent factors considered.

The area is located within the Metropolitan Supply Area primarily due to the Darley sand deposits to the northwest being a large resource of construction sand as an important source for Melbourne. This is evidenced by the number and size of Work Authorities (WA's) in the Darley area (refer map Current WA's EIIA's). Both DEDJTR (now DJPR) and CCAA submissions to C81 Planning Scheme Amendment highlighted that importance. The subject Hopetoun Park area would not appear to sustain such strategic importance.

The EIIA's were predicated on the existence of the favourable geological units and "planning windows" as at 1996 and as briefly reviewed in 2003; in this case to host potential sand and gravel deposits primarily within the upper sand unit over a reasonably sized contiguous area. Since that time, the smaller landholdings and particularly the freeway construction, has altered the appropriateness of the EIIA's size, which upon review under the original methodology would likely reduce the current potential to a point of irrelevance.

The geology of the subject land (refer map Geological Units) is complicated by three differing types of units being an overlying sand and gravel (Darley gravel), a Basalt flow and underlying clays, sands and gravels (Werribee Formation). Traditionally for the region, the upper sand unit has been sourced for construction sand as in the main Darley area, however in this location is a relatively thin deposit. The presence of the basalt layer complicates sand extraction below, and the basalt itself is likely of variable quality due its relative thickness and position between the two sedimentary units. The vertical and lateral extent of the deposits are restricted and material quality questionable, thereby limiting location of an extractive industry.

We note that historically, the subject Hopetoun north land had previous extractive industry applications (refer map Expired El Tenements). These incorporated WA 460 (prev. ElL 1117) Oupan Resources for Basalt and ElL 1508 Ronald Silverstein for sand. A small amount of sand extraction in the south west corner of WA460 (as ElL 1117) was directed toward specialty high grade silica sand from the lower sub-basaltic sand unit. It appears that this was found to be limited and somewhat contaminated by the basaltic layer evident at the site (which was essentially overburden). It is understood following failure of the operation and in-appropriate rehabilitation, the site had to be eventually reclaimed utilising Government bonded funding. Given this previous experience, new applications would be expected to face similar hurdles and potential objectors.

In operative terms, extraction, processing, screening, conveying and stockpiling would likely require buffer distances to sensitive land uses of between 250m to 500m under EPA residual air emissions guidelines for separation distances. The larger distance would be for either sand (potential respirable crystalline silica) or basalt (blasting) production. Given the proximity to at least the three residences identified, and in the case of blasting basalt adjacent to a major freeway, separation distances would severely reduce extraction to a negligible area.

Other considerations for extractive industry locating in the subject area are the planning and environmental controls that would form part of a Planning Permit application. While the zoning does not currently preclude quarrying, it is noted that the land and surrounds are affected by Significant Landscape, Environmental Significance and Design and Development overlays. Issues incorporated into the design and approval of an extractive operation with these controls would be visual amenity aspects, which may affect the western escarpment area in particular and virtually impossible to completely screen from view. Also, Council planning approval would be cognisant of truck transport movements to and from the site along local roads creating dust or noise issues.

Additionally, Aboriginal Cultural Heritage Sensitivity (Wurundgen Woi Wurrung CHAC) abuts, and is located on, the subject land (refer map Aboriginal Cultural Heritage Sensitivity). It appears four specific sites on the land may be registered. Native vegetation as EVC693 Plains Woodland / Grassland Mosaic is also mapped over the area (refer map EVC Native Vegetation). While minimal tree cover is apparent across the site, the mapping would trigger surveys being required. The cost of Cultural Heritage Management Plan (CHMP) preparation and potential offset requirements for native vegetation can be considerable.

While these latter issues could be overcome, the attractiveness or prospectivity of such sites becomes diminished when the cost benefit of the deposit size is also potentially reduced.

The extractive industry approvals process has moved to a risk based approach that requires rigorous management controls that will provide appropriate rehabilitation outcomes on site closure. Each of the factors including viable resource/s, likely noise/dust separation distance of 250m+, visual amenity controls, traffic management, CHMP and native vegetation offsets would have to be risk assessed and controls established for the construction, operation and rehabilitation / closure phases. Market demand and supply would require a substantial resource of specific saleable products to be established to justify the cost of a successful application. On balance, we conclude that the likelihood of establishing a feasible quarry site is very low considering the factors affecting the site.

Yours sincerely, C.K. PROWSE & ASSOCIATES Pty. Ltd.

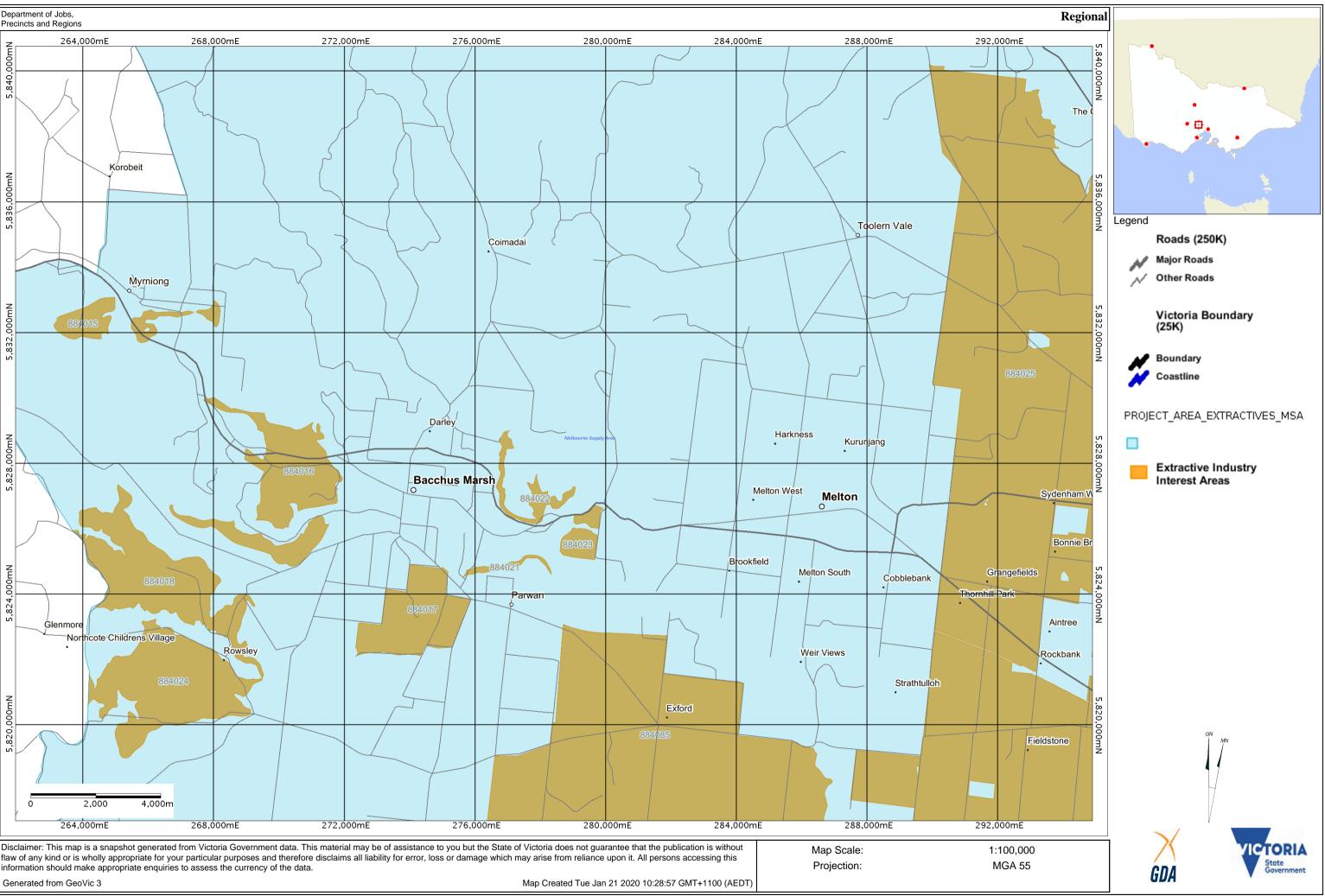
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Christopher Prowse. Principal Consultant



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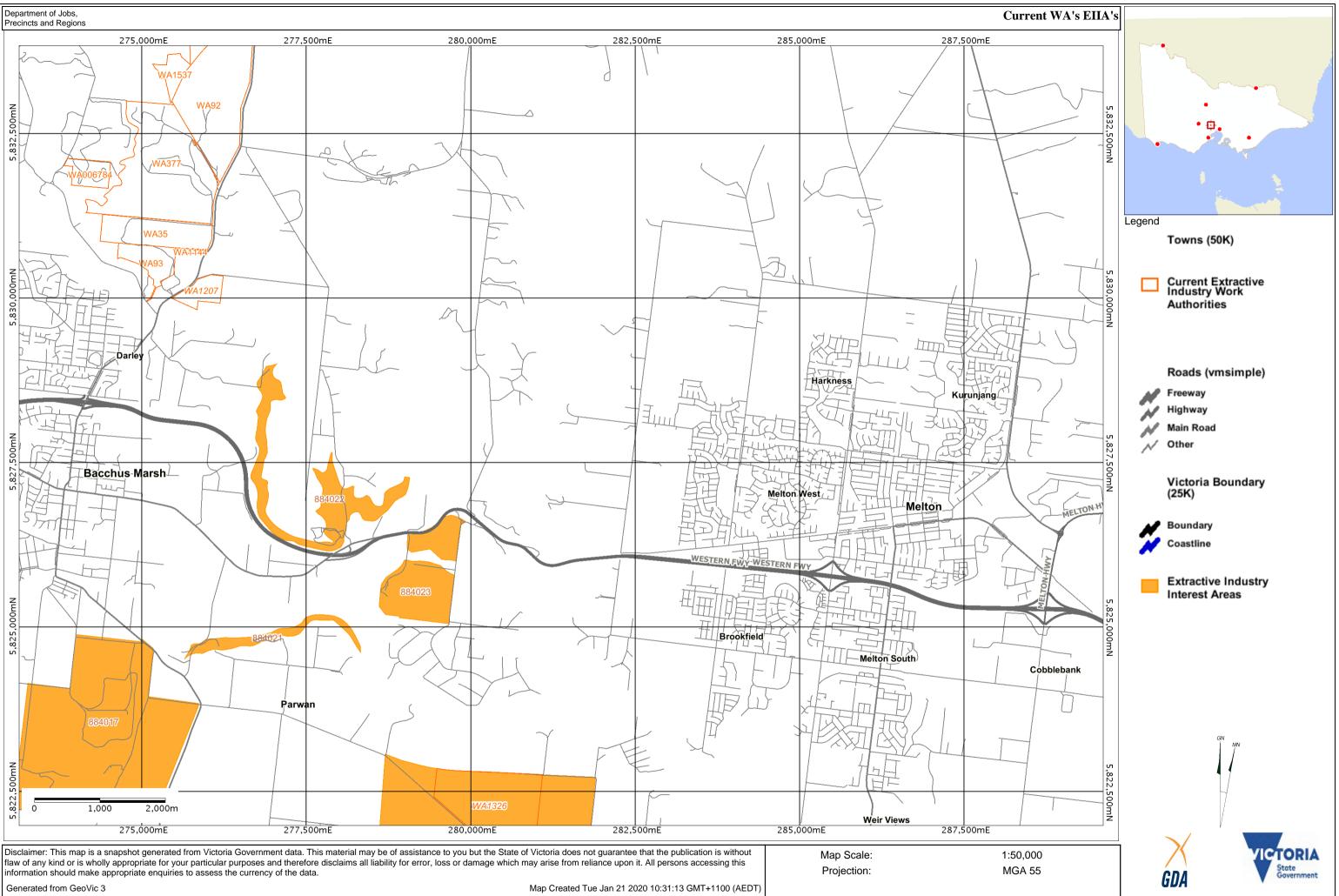
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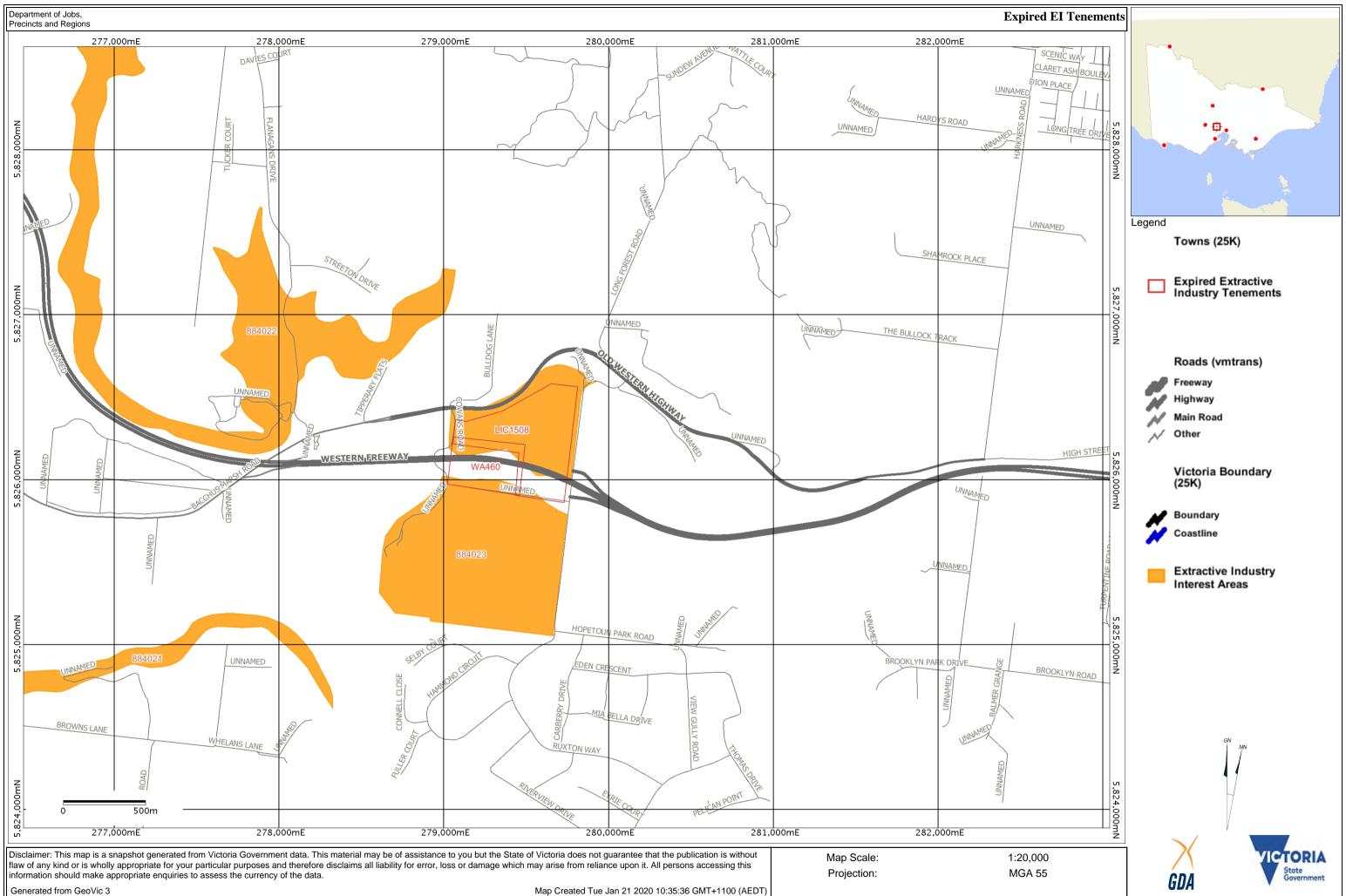
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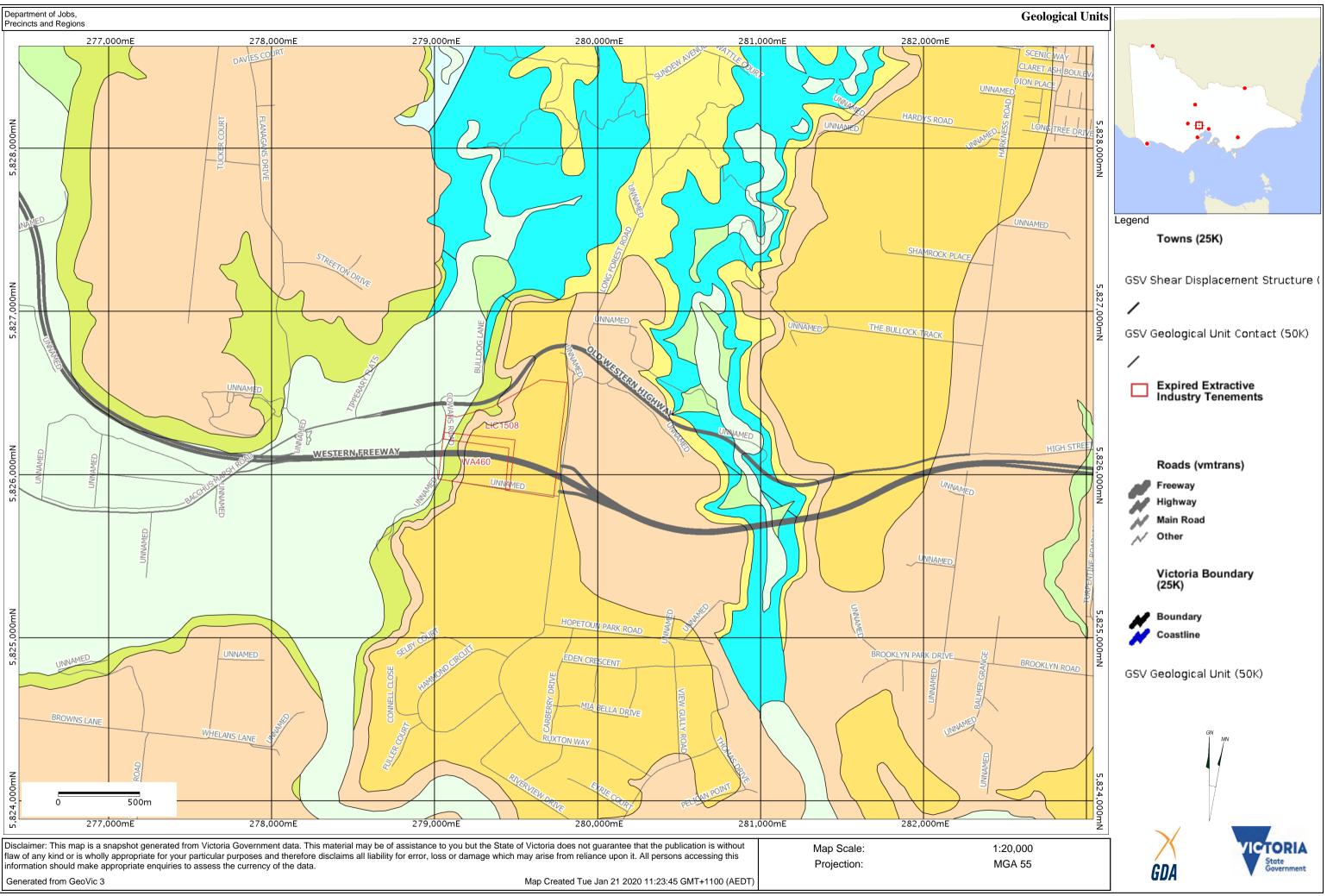
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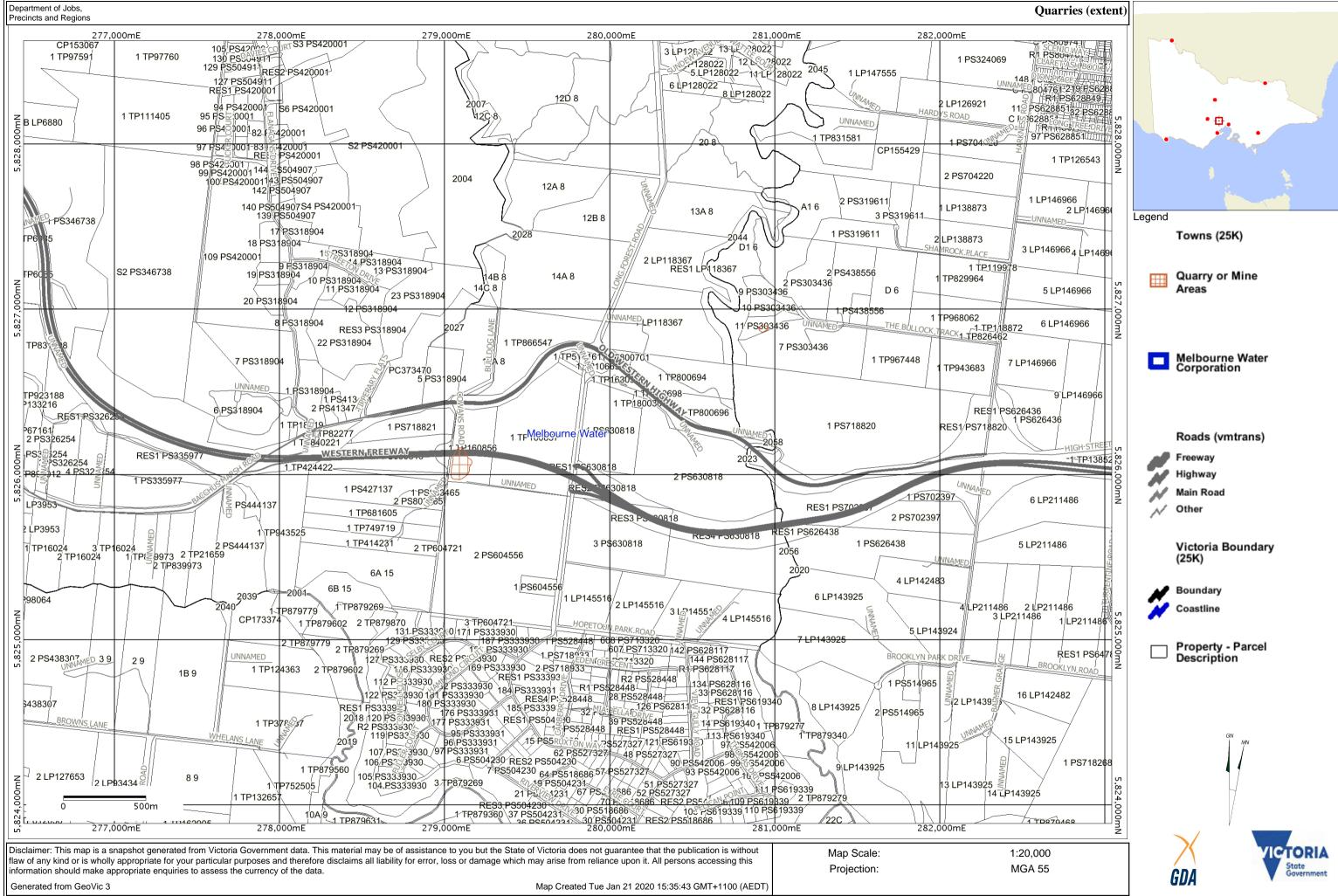
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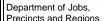


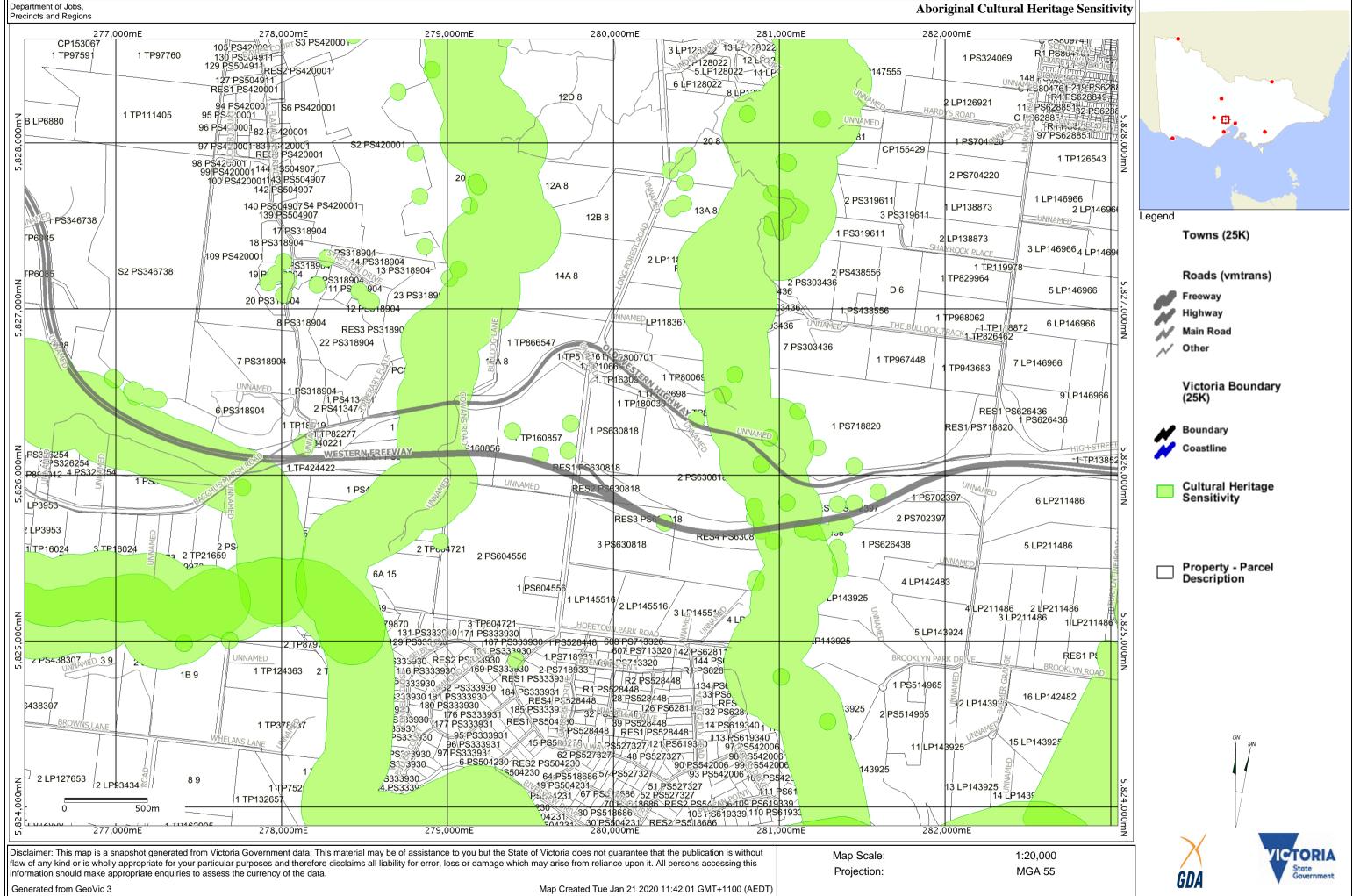


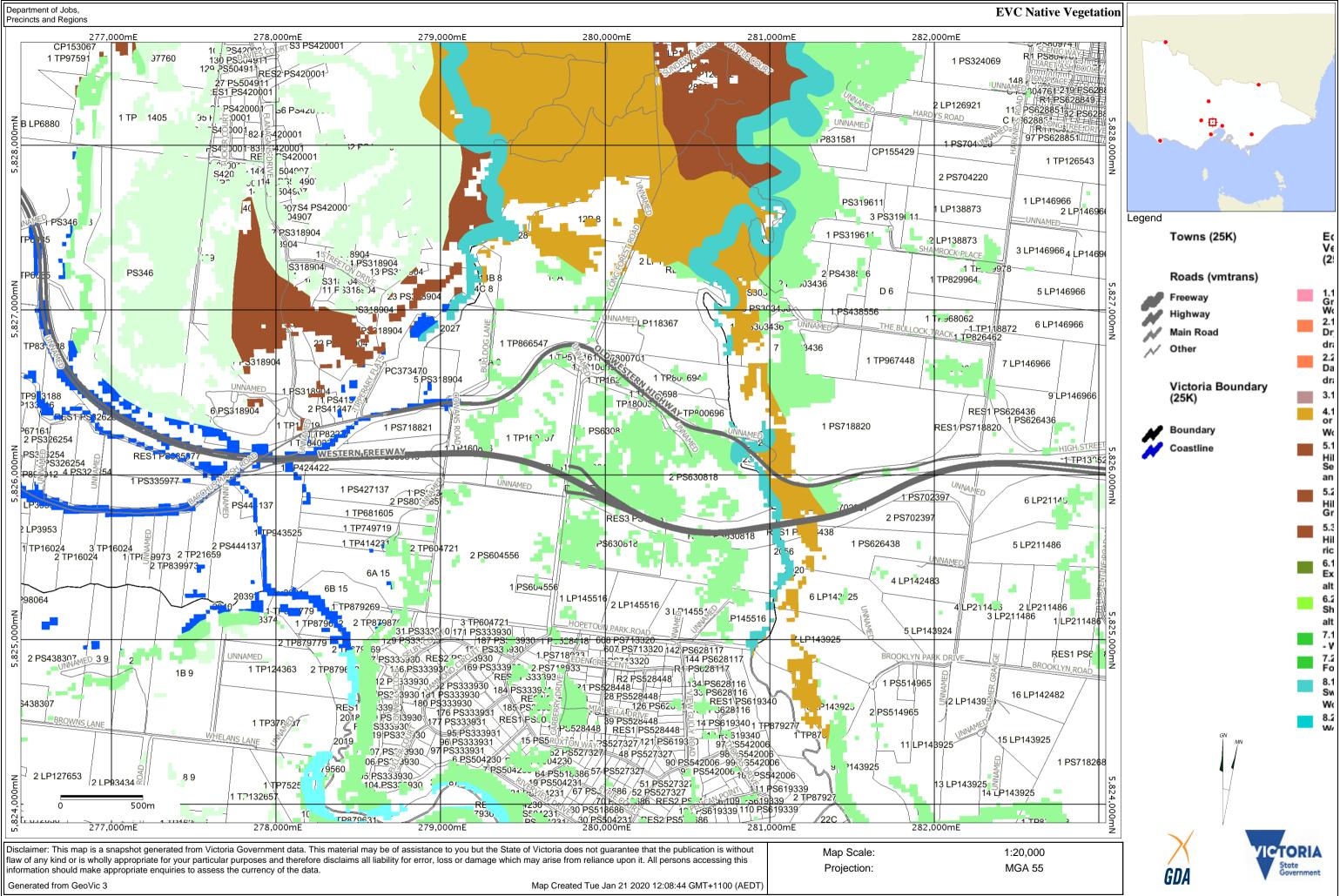


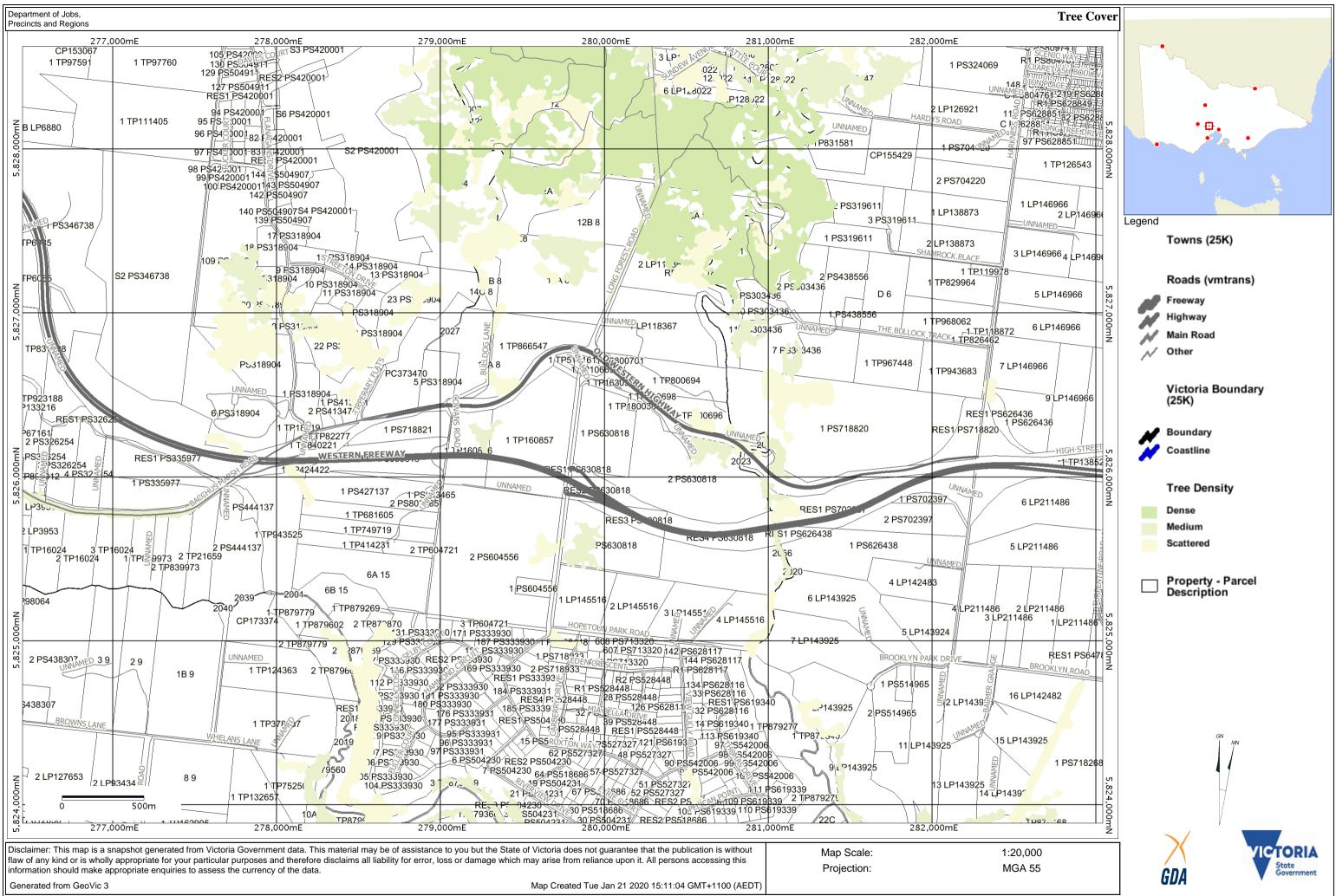


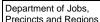


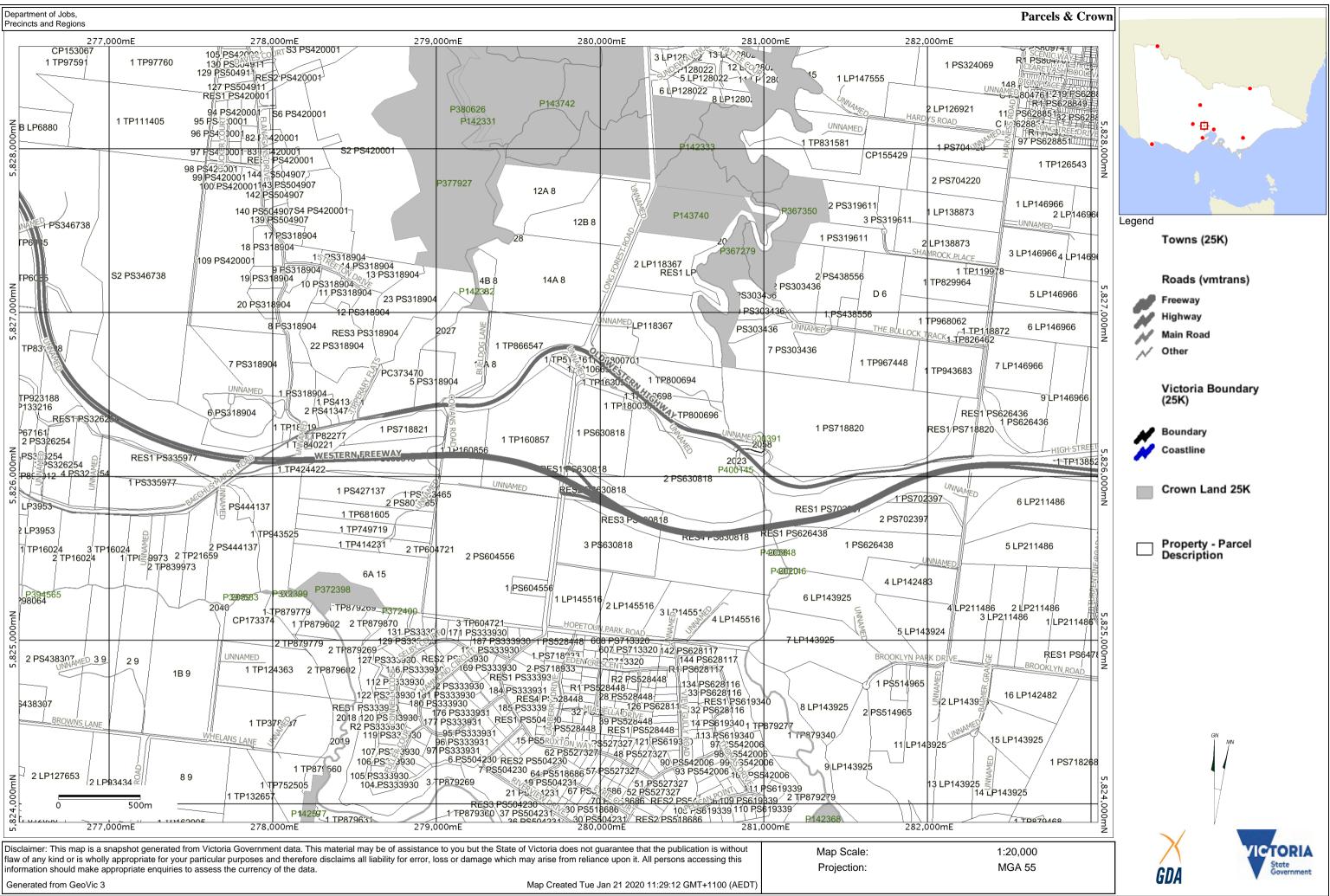












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