



**Douglas Partners**  
*Geotechnics | Environment | Groundwater*

Report on  
Preliminary Site Investigation (Contamination)

Proposed Rezoning  
Portion of 25 Anglo Road, Campsie

Prepared for  
City of Canterbury Bankstown Council

Project 208123.00  
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Integrated Practical Solutions



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The undersigned, on behalf of Douglas Partners Pty Ltd, confirm that this document and all attached drawings, logs and test results have been checked and reviewed for errors, omissions and inaccuracies.

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## Report on Preliminary Site Investigation (Contamination)

### Proposed Rezoning

### Portion of 25 Anglo Road, Campsie

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## 1. Introduction

Douglas Partners Pty Ltd (DP) has been engaged by City of Canterbury Bankstown Council (Council) to complete this Contamination preliminary site investigation (PSI) for a portion of 25 Anglo Road, Campsie (the site). The site location is outlined in Drawing 1, Appendix A.

The investigation was undertaken in accordance with DP's proposal P208123.00.P.001.Rev1 dated 26 August 2021.

Based on the information provided by Council, it is understood that the Bankstown Master Plan was adopted by Council on 28 September 2021. The master plans propose a rezoning of various sites currently zoned SP2 - Special Purpose to B4 Mixed Use and B3 Commercial Core in Bankstown City Centre. In Campsie, it is proposed to re-zone a part of a site containing car parking from SP2 - Infrastructure to B4 - Mixed Use. This PSI is required to address NSW Government Ministerial Directions on rezoning of land, to confirm whether the site is suitable (or will be suitable, after remediation) for dwellings and other more sensitive land uses than is currently permitted on the site.

The objectives of the PSI are to:

- Address Ministerial Direction 2.6 (Remediation of Contaminated Land);
- Based on site history searches and a brief inspection from publicly accessible areas, identify potential sources of contamination on the site;
- Assess potential contamination risks that may preclude rezoning of the site; and
- Comment on the need for further detailed investigation where contamination may be present.

This report must be read in conjunction with all appendices including the notes provided in Appendix B.

The following key guidelines were consulted in the preparation of this report:

- NEPC *National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) [NEPM]* (NEPC, 2013); and
- NSW EPA *Guidelines for Consultants Reporting on Contaminated Land* (NSW EPA, 2020).

## 2. Scope of Works

The scope of works for the PSI comprised the following:

- Review of the following site / history information, provided to DP by Council:
  - o Section 10.7 (2&5) Planning Certificates;

- o Council records available under an Informal application under the Government Information (Public Access) Act 2009 (GIPA Act); and
  - o Available records / documents on current and historic site use / activities.
- Review of the following site history information / records, obtained by DP:
  - o Historical aerial photographs;
  - o SafeWork NSW database search for records of dangerous goods licenses registered to the site;
  - o Historical title deed searches for each lot comprising the site;
  - o NSW EPA databases held under the CLM and POEO Acts for the site and adjoining properties;
  - o Registered groundwater bores;
  - o Regional geological, soil and hydrogeological mapping; and
  - o Acid sulfate soil and salinity risk maps.
- A site walkover to observe and record external appearance of each property, current land uses, signs of historical uses, hydrogeological features (i.e., streams, dams, water wells, catchments and drainage), presence of fill, waste disposal practices, etc. The walkover was undertaken from publicly accessible areas and did not comprise a detailed walkover within the premises unless it was a publicly accessible area;
- Based on the above information identify areas of environmental concern (AEC) and contaminants of potential concern (CoPCs);
- Preparation of a conceptual site model (CSM); and
- Prepare this PSI report.

### 3. Site Information

Site Address	Portion of 25 Anglo Road, Campsie
Legal Description	Lot B, Deposit Plan 936699
Area	210 m <sup>2</sup>
Current Zoning	Zone SP2 Infrastructure (Drainage)
Proposed Zoning	Zone B4 Mixed Use
Local Council Area	City of Canterbury Bankstown Council
Current Use	Building entrance extension for Campsie RSL, storage and a part of adjacent construction site office

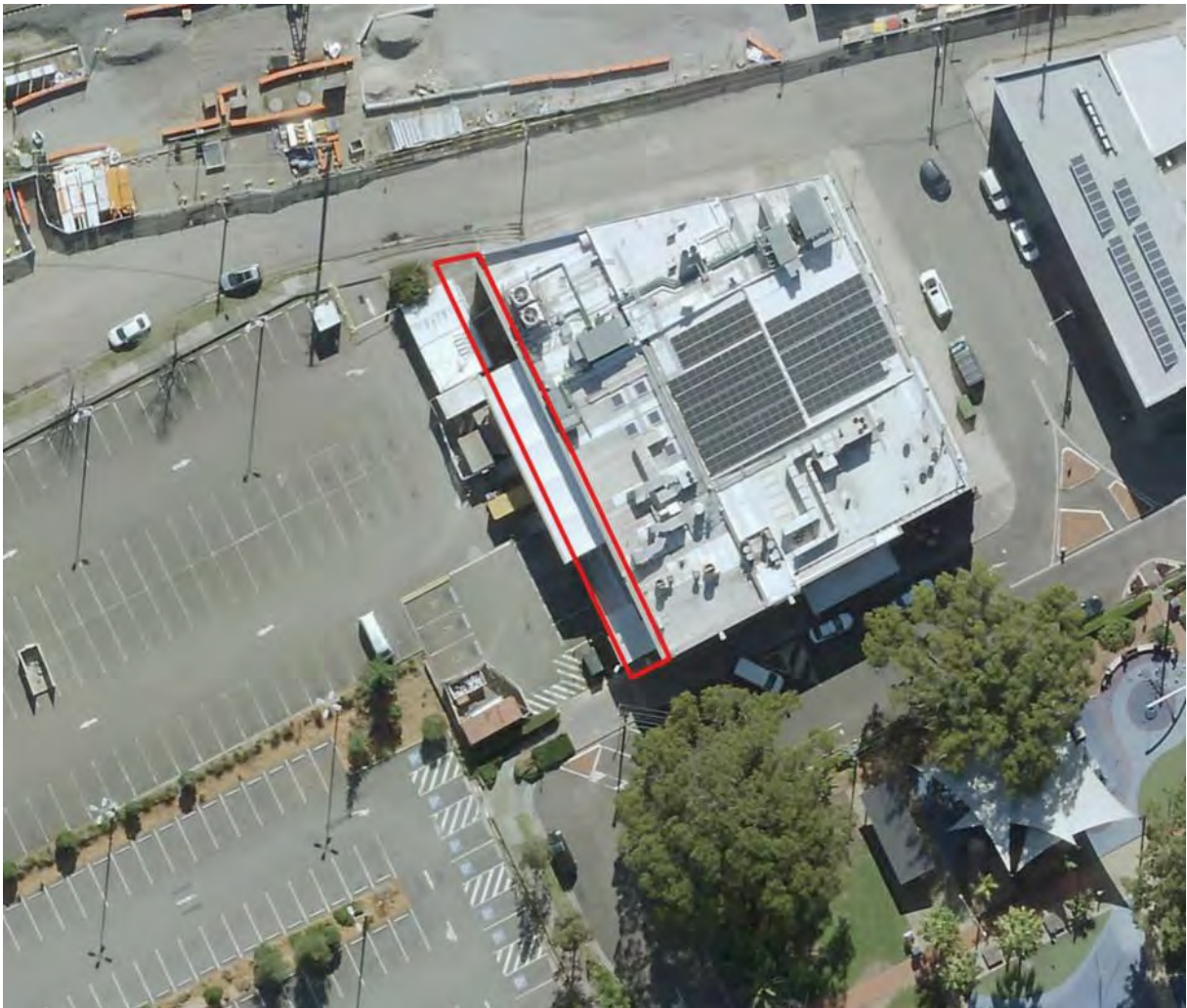
Surrounding Uses

North - Lilian Street followed by Sydney Metro South Campsie Maintenance Depot.

East - Adjoined to Campsie RSL followed by Dewar Street and mixed commercial residential low rise beyond.

South - Anzac Square followed by Anzac Park

West - Temporary site office and mobile refrigeration followed by Campsie RSL Car Park



**Figure 1: Site Location**

## **4. Environmental Setting**

### **4.1 Topography**

The site is situated on an elevation of approximately 20 m AHD, the topography at the site and within its immediate area appears relatively flat.

### **4.2 Site Geology**

The Sydney 1:100000 Soil Landscape map indicates that the site is underlain by residual soil landscape of the Blacktown group which comprises gently undulating rises of shallow to moderately deep red and brown podzolic soils on crests, upper slopes and well drained areas, deep, yellow podzolic soils and soloths on lower slopes and areas of poor drainage.

The Sydney 1:100000 Geological map indicates that the site is underlain by Ashfield shale of the Wianamatta group which comprises black to dark grey shale and laminate.

### **4.3 Acid Sulphate Soils and Salinity**

Published acid sulphate soils (ASS) risk mapping indicates that the site has a low probability of having ASS.

There are no mapped areas of ASS occurrence within 2 km of the site.

Published salinity risk mapping indicates that the site has a low salinity potential.

### **4.4 Surface Water and Groundwater**

The nearest water body to the site is the Cook's River, situated approximately 1 km north arching east (downgradient of the site), which feeds into Botany Bay. Other surface water bodies are significantly further from the site. Given the local area is urbanised, it is anticipated a significant portion of rainfall is collected within the stormwater network.

A search of the publicly available registered groundwater bore database indicated that there are no registered groundwater bores within 1 km of the site. The search identified several registered groundwater bores within 2 km and west of Cook's River, however an inference on groundwater flow cannot be made due to the absence of data on standing water level in any of the groundwater bores.

Based on the regional topography and the inferred flow direction of nearby water courses, the anticipated flow direction of groundwater beneath the site is to the southeast, towards Botany Bay, the likely receiving surface water body for the groundwater flow path.

Given the local geology (i.e., Ashfield Shale), the groundwater in the fractured rock beneath the site is anticipated to be saline and very low yield. Accordingly, there would be no significant potential beneficial uses of the groundwater.

## 5. Site History

### 5.1 Title Deeds

A historical title deeds search was used to obtain ownership and occupancy information including company names and the occupations of individuals. The title information can assist in the identification of previous land uses by the company names or the site owners and can, therefore, assist in establishing whether there were potentially contaminating activities occurring at the site. A summary of the title deeds and possible land uses (with reference to the aerial photographs and other historical searches) is presented in Table.

**Table 1: Historical Title Deeds**

Date of Acquisition and Term Held	Registered Proprietor(s) & Occupations	Inferred Land Use
02.09.1911 (1911 to 1976)	Lucy Alice Matilda Humphery (Widow)	Possibly Residential
07.05.1976 (1976 to 2017)	The Metropolitan Water Sewerage and Drainage Board (Sydney Water)	Carpark
14.03.2017 (2017 to Date)	Campsie RSL Sub-Branch Club Limited *	Carpark

\*Note: There is a Sydney Water Corporation Easement for stormwater purposes affecting the entirety of the site.

### 5.2 Historical Aerial Photography

Several historical aerial photographs were obtained from public databases. Extracts of the aerial photographs are included in Appendix D. A summary of key features observed for the site and surrounding land is presented in Table 2.

**Table 2: Summary of Historical Aerial Photographs**

Year	Site	Surrounding Land Use
1943	The site appears to be a part of an urban residential property containing a house and yard.	The surrounding area appears to comprise predominantly urban residential properties to the east and west, Anglo Road then railway to the north and public park to the south.
1955	No significant changes to the site were observed when compared with the 1943 aerial photograph.	Additional residential development nearby to the east (potential unit block, or commercial development) and west of the site.
1961	No significant changes to the site were observed when compared with the 1955 aerial photograph.	Additional residential development (or possibly commercial) nearby to the east.



Year	Site	Surrounding Land Use
1971	The site appears to be redeveloped into a carpark associated with the adjoining Sydney Water premises.	Adjoining eastern property appears to comprise a commercial development (possibly Sydney Water).
1982	Site appears to be paved and a part of the extended car park.	Residential property adjoining west of the site has been redeveloped into a car park. Development of unknown structure adjacent to the rail line, north-east of the site.
1991	No significant changes to the site were observed when compared with the 1982 aerial photograph.	Adjoining eastern property appears to have undergone minor building upgrades. Installation of a transformer near the south-west corner of the site. Minor residential/commercial redevelopment to the east.
1998	No significant changes to the site were observed when compared with the 1991 aerial photograph.	Adjoining eastern property appears to have undergone building upgrades.
2007	Temporary structures of what appears to be cargo/refrigeration containers occupy the site.	Adjoining eastern property appears to have undergone building upgrades. Construction of what appears to be a rail maintenance shed to the north of the site (opposite Anglo Road).
2016	Removal of previous structures and construction of a building extension from adjoining eastern building.	Redevelopment of residential dwellings to the southwest of the site to a car park. Structural upgrades to Anzac Park south of the site.

### 5.3 Public Registers and Planning Records

EPA Notices available under Section 58 of the Contaminated Lands Management Act (CLM Act) [accessed 06/12/2021]	A search of EPA records of notices for contaminated sites indicated that there were no records of notices for the site. There is one current notice for Budget Petroleum and adjacent property located on 403 Canterbury Road and 1 Una Street approximately 834 m south-southeast of the site.
Sites notified to EPA under Section 60 of the CLM Act [accessed 06/12/2021]	The results of a search of the public database of contaminated sites notified to the EPA indicated that the site was not listed as a notified contaminated site. The search also indicated that there were no records of notices for sites within a 1km search buffer of the site.
SafeWork NSW	Awaiting authorisation letter from site owner.
Planning Certificate(s)	Planning certificates for the site indicate that the council is not aware of the land being affected by any matters as prescribed by Section 59 (2) of the <i>Contaminated Land Management Act 1997</i> . Refer Appendix F.

Council Records

No relevant records were provided by the council specific to the site.

## 5.4 Other Sources

A brief review of google listed businesses indicated Sydney Metro South Campsie Maintenance Depot is located approximately 40 m north from the site.

## 5.5 Site History Integrity Assessment

The information used to establish the history of the site was sourced from reputable and reliable reference documents, many of which were official records held by Government departments / agencies. The databases maintained by various Government agencies potentially can contain high quality information, but some of these do not contain any data at all.

In particular, aerial photographs provide generally high quality information that is generally independent of memory or documentation. They are only available at intervals of several years, so some gaps exist in the information from this source. The observed site features are open to different interpretations and can be affected by the time of day and / or year at which they were taken, as well as specific events, such as flooding. Care has been taken to consider different possible interpretations of aerial photographs and to consider them in conjunction with other lines of evidence.

## 5.6 Summary of Site History

Information on historical aerial photographs and historical leases suggest the site was a part of a residential property at least since 1943. The surrounding area was largely residential at the same time, up to the 1960s with gradual commercial development occurring in adjoining lots over time.

Between 1961-1971, the site appeared to be cleared for use as parking space associated with the adjoining commercial building to the east (possibly Sydney Water). In 1976 the site was acquisitioned by The Metropolitan Water Sewerage and Drainage Board (Sydney Water). The site was acquired by Campsie RSL Sub-Branch Club Limited from Sydney Water in 2017 and a stormwater easement is in effect over the site.

A search of properties with EPA notices and licences and review of Section 10.7 Planning Certificates did not identify the site to be notified to the EPA as contaminated, be regulated under the CLM Act, or holding a licence under the POEO Act. The search identified one current notice of investigation approximately 830 m south-southeast of the site, however given the impermeable nature of the soil landscape, the distance and location (downgradient) of possible contamination, it is unlikely that contaminants sourced from this location would impact the site.

In addition, the Sydney Metro South Campsie Maintenance Depot is situated approximately 40 m north of the site and may host contaminating activities. However, given the relatively small scale of the site, low likelihood of contaminating activities taking place and the impermeable nature of the soil landscape, it is unlikely that contaminants sourced from this location would impact the site and hence considered to be of very low risk.

## 6. Site Walkover

### 6.1 Observations

A site walkover was undertaken by an environmental scientist on 30 November 2021. The general site topography was consistent with that described in Section 4.1. The site layout appears to have remained relatively unchanged from the 2021 aerial photograph (used as the base in Drawing 1). The following key site features pertinent to the PSI were observed (refer to photographs in Appendix G).

- Electrical transformer box (Photograph 1);
- Evidence of multiple underground utilities (Photograph 2 & 3);
- Construction site office, generator and refrigerated cargo containers (Photograph 4);
- Pavement in poor condition (Photograph 5); and
- Sydney Metro south Campsie maintenance depot observed on the opposite side of Anglo Road (photograph 6).

## 7. Preliminary Conceptual Site Model

A Conceptual Site Model (CSM) is a representation of site-related information regarding contamination sources, receptors and exposure pathways between those sources and receptors. The CSM provides the framework for identifying how the site became contaminated and how potential receptors may be exposed to contamination either in the present or the future i.e., it enables an assessment of the potential source - pathway - receptor linkages (complete pathways).

### Potential Sources

Based on the current investigation, the following potential sources of contamination and associated contaminants of potential concern (COPC) have been identified.

- S1: Fill: Associated with levelling and backfilling, including around underground utilities.
  - o COPC include metals, total recoverable hydrocarbons (TRH), benzene, toluene, ethylbenzene, xylene (BTEX), polycyclic aromatic hydrocarbons (PAH), polychlorinated biphenyls (PCB), organochlorine pesticides (OCP), phenols and asbestos.
- S2: Current and former site use [entrance, car park, storage and construction site office] potential leakage and spillage from vehicles; stockpile of materials.
  - o COPC include metals, total recoverable hydrocarbons (TRH), benzene, toluene, ethylbenzene, xylene (BTEX), polycyclic aromatic hydrocarbons (PAH), polychlorinated biphenyls (PCB), organochlorine pesticides (OCP) and phenols.
- S3: Surrounding site use [previous rail uses, transformer]
  - o COPC include metals, TRH, volatile organic compounds (VOC), PCB and asbestos.
- S4: Hazardous building materials (HBM) - deterioration / demolition of previous structures on and adjacent to the site.
  - o COPC include metals, PCB and asbestos.



### Potential Receptors

The following potential human receptors have been identified:

- R1: Current users [visitors, construction workers];
- R2: Construction and maintenance workers;
- R3: End users [mixed use]; and
- R4: Adjacent site users [commercial, public open space and car park].

The following potential environmental receptors have been identified:

- R5: Surface water [Cook's River]; and
- R6: Groundwater.

### Potential Pathways

The following potential pathways have been identified:

- P1: Ingestion and dermal contact;
- P2: Inhalation of dust and / or vapours;
- P3: Surface water run-off;
- P4: Lateral migration of groundwater providing base flow to water bodies; and
- P5: Leaching of contaminants and vertical migration into groundwater.

### Summary of Potentially Complete Exposure Pathways

A 'source-pathway-receptor' approach has been used to assess the potential risks of harm being caused to human or environmental receptors from contamination sources on or in the vicinity of the site, via exposure pathways (potential complete pathways). The possible pathways between the above sources (S1 to S4) and receptors (R1 to R6) are provided in below Table.

**Table 3: Summary of Potentially Complete Exposure Pathways**

Source and COPC	Transport Pathway	Receptor	Risk Management Action
S1: Fill - Metals, TRH, BTEX, PAH, OCP and asbestos S2: Current and former site use - metals, TRH, BTEX, PAH, PCB, OCP and phenols S4: HBM – metals, PCB, Asbestos	P1: Ingestion and dermal contact	R2: Construction and maintenance workers R3: End users [mixed use]	An intrusive investigation is recommended to assess the presence or otherwise of the identified potential sources and/or the contaminants associated with those sources. The investigation is recommended to include soil and groundwater sampling and testing.
	P2: Inhalation of dust and/or vapours	R1: Current users [storage and construction site office] R2: Construction and maintenance workers R3: End users [mixed use] R4: Adjacent site users [commercial, public open space and carpark].	
	P3: Surface water run-off P4: Lateral migration of groundwater providing base flow to water bodies P5: Leaching of contaminants and vertical migration into groundwater	R5: Surface water [Cook's River]; R6: Groundwater	
S4: Surrounding Site Use: metals, TRH, VOC, PCB and asbestos.	P3: Surface water run-off P4: Lateral migration of groundwater providing base flow to water bodies P5: Leaching of contaminants and vertical migration into groundwater	R4: Adjacent site users [commercial, public open space and carpark]. R5: Surface water [Cook's River]; R6: Groundwater	

## 8. Risk Rating

Based on the preliminary CSM and using the methodology outlined in Appendix H, a qualitative risk rating for the identified contamination sources has been developed.

Table 6 presents the results of the application of the risk matrix (Appendix H) to each identified potential AEC.

**Table 1: AEC Risk Rating**

AEC	AEC Description	Probability	Consequence	Risk Number
S1	Fill	3	3	9
S2	Current and former Use	3	2	6
S3	Adjacent / Nearby Use	2	5	10
S4	HBM	2	2	4
			<b>Site Risk Rating</b>	<b>10</b>

## 9. Conclusions and Recommendations

Based on the available site history information, the site appears to have been part of residential property from at least 1943 to 1961. Historical aerial photographs suggest the site was used predominantly as parking space from at least 1971, associated with the Sydney Water depot, and more recently the RSL club. the surrounding land use is predominantly commercial and residential to the east and west, public open space to the south and the Sydney Metro South Campsie Maintenance Depot is north of the site beyond which is the Bankstown rail line, which has been in existence since before 1943. At the time of the site walkover, the site was in use as an entrance to the adjoining restaurant (Sun Ho Dim Sum), it also hosts a part of a construction site office, what appeared to be temporary storage and is adjoined to the RSL car park.

SafeWork NSW records pertinent to potential contamination issues at the site were not obtained at the time of reporting. This is considered to be a data gap in the investigation.

Potential sources of contamination identified in this investigation include imported fill, potentially contaminating activities associated with adjacent land use and current mixed use. Based on the results of this PSI, and in accordance with the process outlined in Appendix H, the site has been assigned a contamination risk rating of 10, corresponding to a medium risk.

As the current investigation was limited to a desktop study, comments on the actual contamination status of the site cannot be provided unless intrusive investigations are undertaken to obtain quantitative data on the contamination status of the soil and groundwater. Notwithstanding, the desktop results to date suggest that the identified sources of potential contamination and assigned contamination risk for the site are not necessarily uncommon when compared to other similar properties in urban settings.

Accordingly, based on the results of this PSI, the following is recommended:

- **Detailed Site Investigation** - A detailed site investigation (DSI) for contamination with intrusive soil and groundwater / soil vapour (potentially) sampling to evaluate the potential contamination status of the site and assess the site's suitability (from a contamination standpoint) for a more sensitive land use. In addition, the DSI should provide recommendations on the need for any further targeted investigation(s) and / or site remediation if deemed necessary. As the details of the proposed development are not known at this stage, the DSI could be undertaken around the Development Application (DA) stage i.e., when particulars of the proposed development are known.

Based on the results of the PSI, it is considered that the site can be made suitable for the proposed B4- Mixed Use rezoning subject to implementation of the recommended investigations and remediation and / or management of contamination that may be identified from the investigations.

Whilst the extent and need for remediation, if any, will be dependent on the results of the intrusive investigation/s and the details of the proposed development, typical soil remediation options that may be viable (to be selected or revised based on type of contamination identified) have been provided below for information purposes only:

- **Excavation and Offsite Disposal** - Excavation of the impacted fill and off-site disposal to a suitably licensed landfill. Subject to complete removal (and validation) of the contamination source (including groundwater remediation if required), this option could likely render the site compatible with a proposed land use without the need for long term management strategies; or
- **Capping and containment:** This option typically comprises placement of a geotextile marker layer (such as bidum) over the contaminated profile and subsequently placement / installation of a layer of suitable capping material such as verified clean fill, or a permanent engineered pavement over the contaminated fill with a view to limiting the exposure of site users to contaminants. A physical barrier will require the preparation of and compliance with an Environmental Management Plan (EMP) for long term management of the capping layer, with provisions made for regular inspection and maintenance if necessary. Furthermore, a cap and contain remediation strategy will need to have an appropriate mechanism for public notification of any restrictions applying to the land to ensure that potential purchasers or other interested individuals are aware of the restrictions (e.g., appropriate notations on a planning certificate issued under Section 10.7 of the Environmental Planning and Assessment Act 1979 or a covenant registered on the title to land under section 88B of the Conveyancing Act 1919).

Should hydrocarbon contamination in groundwater be identified as part of the DSI, then dependent on the nature and severity of the contamination, Monitored Natural Attenuation (MNA) could be utilised as a groundwater remediation option.

## 10. References

- NEPC. (2013). *National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) [NEPM]*. Australian Government Publishing Services Canberra: National Environment Protection Council.
- NSW EPA. (2020). *Guidelines for Consultants Reporting on Contaminated Land*. Contaminated Land Guidelines: NSW Environment Protection Authority.

## 11. Limitations

Douglas Partners (DP) has prepared this report (or services) for this project at 25 Anglo Road, Campsie in accordance with DP's proposal dated 26 August 2021 and acceptance received from Liam Rogers dated 26 October 2021. The work was carried out under DP's Conditions of Engagement. This report is provided for the exclusive use of City of Canterbury Bankstown Council for this project only and for the purposes as described in the report. It should not be used by or relied upon for other projects or purposes on the same or other site or by a third party. Any party so relying upon this report beyond its exclusive use and purpose as stated above, and without the express written consent of DP, does so entirely at its own risk and without recourse to DP for any loss or damage. In preparing this report DP has necessarily relied upon information provided by the client and/or their agents.

DP's advice is based upon the conditions encountered during this investigation. The accuracy of the advice provided by DP in this report may be affected by undetected variations in ground conditions across the site between and beyond the sampling and/or testing locations. The advice may also be limited by budget constraints imposed by others or by site accessibility.

The assessment of atypical safety hazards arising from this advice is restricted to the environmental components set out in this report and based on known project conditions and stated design advice and assumptions. While some recommendations for safe controls may be provided, detailed 'safety in design' assessment is outside the current scope of this report and requires additional project data and assessment.

This report must be read in conjunction with all of the attached and should be kept in its entirety without separation of individual pages or sections. DP cannot be held responsible for interpretations or conclusions made by others unless they are supported by an expressed statement, interpretation, outcome or conclusion stated in this report.

This report, or sections from this report, should not be used as part of a specification for a project, without review and agreement by DP. This is because this report has been written as advice and opinion rather than instructions for construction.

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**Douglas Partners Pty Ltd**

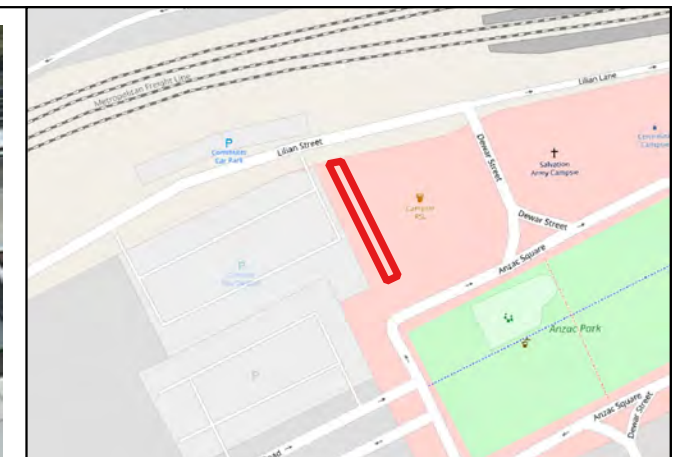
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## Appendix A

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Drawings





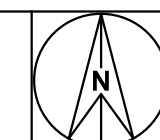
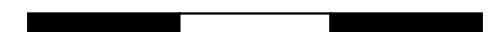
LOCALITY MAP

- Notes:
1. Basemap from Metromap.com (dated 30/07/2021)
  2. Site boundary shown is approximate only

Legend

Site Boundary

0 10 20 30 m





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## Appendix B

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Notes About this Report



# About this Report

## Douglas Partners



### Introduction

These notes have been provided to amplify DP's report in regard to classification methods, field procedures and the comments section. Not all are necessarily relevant to all reports.

DP's reports are based on information gained from limited subsurface excavations and sampling, supplemented by knowledge of local geology and experience. For this reason, they must be regarded as interpretive rather than factual documents, limited to some extent by the scope of information on which they rely.

### Copyright

This report is the property of Douglas Partners Pty Ltd. The report may only be used for the purpose for which it was commissioned and in accordance with the Conditions of Engagement for the commission supplied at the time of proposal. Unauthorised use of this report in any form whatsoever is prohibited.

### Borehole and Test Pit Logs

The borehole and test pit logs presented in this report are an engineering and/or geological interpretation of the subsurface conditions, and their reliability will depend to some extent on frequency of sampling and the method of drilling or excavation. Ideally, continuous undisturbed sampling or core drilling will provide the most reliable assessment, but this is not always practicable or possible to justify on economic grounds. In any case the boreholes and test pits represent only a very small sample of the total subsurface profile.

Interpretation of the information and its application to design and construction should therefore take into account the spacing of boreholes or pits, the frequency of sampling, and the possibility of other than 'straight line' variations between the test locations.

### Groundwater

Where groundwater levels are measured in boreholes there are several potential problems, namely:

- In low permeability soils groundwater may enter the hole very slowly or perhaps not at all during the time the hole is left open;

- A localised, perched water table may lead to an erroneous indication of the true water table;
- Water table levels will vary from time to time with seasons or recent weather changes. They may not be the same at the time of construction as are indicated in the report; and
- The use of water or mud as a drilling fluid will mask any groundwater inflow. Water has to be blown out of the hole and drilling mud must first be washed out of the hole if water measurements are to be made.

More reliable measurements can be made by installing standpipes which are read at intervals over several days, or perhaps weeks for low permeability soils. Piezometers, sealed in a particular stratum, may be advisable in low permeability soils or where there may be interference from a perched water table.

### Reports

The report has been prepared by qualified personnel, is based on the information obtained from field and laboratory testing, and has been undertaken to current engineering standards of interpretation and analysis. Where the report has been prepared for a specific design proposal, the information and interpretation may not be relevant if the design proposal is changed. If this happens, DP will be pleased to review the report and the sufficiency of the investigation work.

Every care is taken with the report as it relates to interpretation of subsurface conditions, discussion of geotechnical and environmental aspects, and recommendations or suggestions for design and construction. However, DP cannot always anticipate or assume responsibility for:

- Unexpected variations in ground conditions. The potential for this will depend partly on borehole or pit spacing and sampling frequency;
- Changes in policy or interpretations of policy by statutory authorities; or
- The actions of contractors responding to commercial pressures.

If these occur, DP will be pleased to assist with investigations or advice to resolve the matter.

# *About this Report*

## **Site Anomalies**

In the event that conditions encountered on site during construction appear to vary from those which were expected from the information contained in the report, DP requests that it be immediately notified. Most problems are much more readily resolved when conditions are exposed rather than at some later stage, well after the event.

## **Information for Contractual Purposes**

Where information obtained from this report is provided for tendering purposes, it is recommended that all information, including the written report and discussion, be made available. In circumstances where the discussion or comments section is not relevant to the contractual situation, it may be appropriate to prepare a specially edited document. DP would be pleased to assist in this regard and/or to make additional report copies available for contract purposes at a nominal charge.

## **Site Inspection**

The company will always be pleased to provide engineering inspection services for geotechnical and environmental aspects of work to which this report is related. This could range from a site visit to confirm that conditions exposed are as expected, to full time engineering presence on site.

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## Appendix C

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Historical Title Deeds



ABN: 36 092 724 251  
Ph: 02 9099 7400  
(Ph: 0412 199 304)

Level 14, 135 King Street, Sydney  
Sydney 2000  
GPO Box 4103 Sydney NSW 2001  
DX 967 Sydney

**Summary of Owners Report**

**Address: - 25-31 Anglo Road, Campsie NSW 2194**

**Description: - Lot B in D.P. 936699**

**As regards to Lot B in D.P. 936699**

<b><u>Date of Acquisition and term held</u></b>	<b><u>Registered Proprietor(s) &amp; Occupations where available</u></b>	<b><u>Reference to Title at Acquisition and sale</u></b>
02.09.1911 (1911 to 1976)	Lucy Alice Matilda Humphery (Widow)	Vol 2179 Fol 73
07.05.1976 (1976 to 2017)	The Metropolitan Water Sewerage and Drainage Board	Vol 2179 Fol 73 Then Vol 13067 Fol 9 Now B/936699
14.03.2017 (2017 to Date)	# Campsie RSL Sub-Branch Club Limited	B/936699

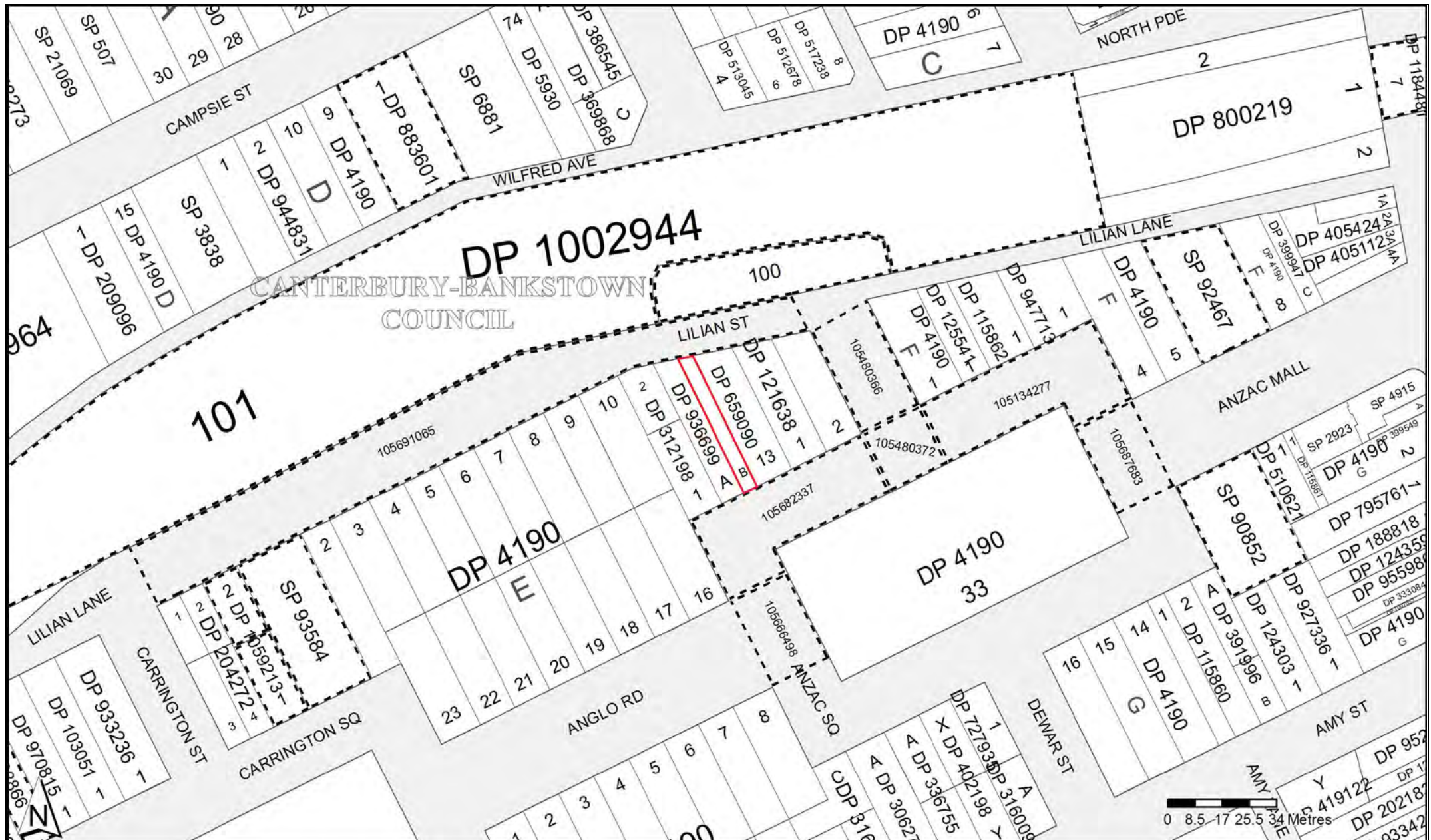
**# Denotes current registered proprietor**

**Leases: - NIL**

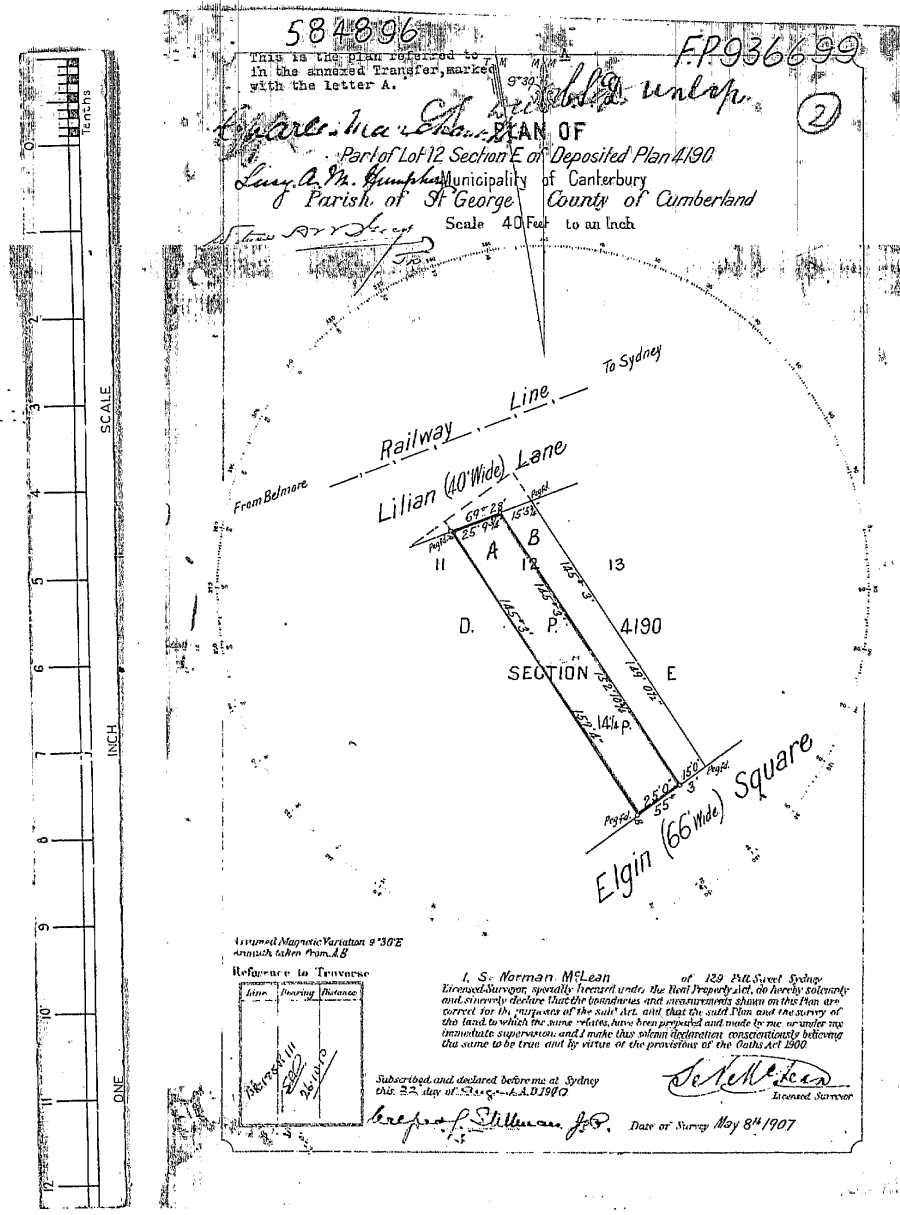
**Easements:**

- 14.03.2017 (AM89161) Easement for stormwater drainage purposes affecting the whole land.

Yours Sincerely  
Harrison Byrne  
(Checked by Mark Groll)  
19<sup>th</sup> November 2021







Lot numbers added in Registrar General's Department.

I, Jack Hayward Watson, Registrar General, certify that this negative is a photograph made as a permanent record of an instrument in my custody this 1st day of August 1969.

*Jack Hayward Watson*



# CIFICATE OF TITLE



13067009

NEW SOUTH WALES

AL PROPERTY ACT, 1900

Appln. No. 7250

P



EDITION ISSUED

11 6 1976

I certify that the person described in the First Schedule is the registered proprietor of the undermentioned estate in the land within described subject nevertheless to such exceptions encumbrances and interests as are shown in the Second Schedule.

*Jan Watson*

Registrar General.

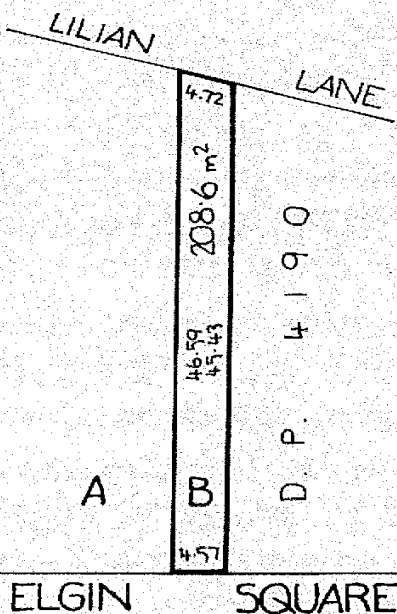


## PLAN SHOWING LOCATION OF LAND

LENGTHS ARE IN METRES

**CANCELLED**

SEE AUTO FOLIO



P655396 *11/15*

*GRN*

REDUCTION RATIO 1:500

## ESTATE AND LAND REFERRED TO

Estate in Fee Simple in Lot B in Deposited Plan 936699 at Campsie in the Municipality of Canterbury Parish of St. George and County of Cumberland being part of Portion 76 granted to John Redmond on 25-8-1812.

## FIRST SCHEDULE

## SECOND SCHEDULE

NIL.

WARNING: THIS DOCUMENT MUST NOT BE REMOVED FROM THE LAND TITLES OFFICE.

PERSONS ARE CAUTIONED AGAINST ALTERING OR ADDING TO THIS CERTIFICATE OR ANY NOTIFICATION HEREON

[illegible][illegible]

**NOTE: ENTRIES RULED THROUGH AND AUTHENTICATED BY THE SEAL OF THE REGISTRAR GENERAL ARE CANCELLED**





NEW SOUTH WALES LAND REGISTRY SERVICES - HISTORICAL SEARCH

SEARCH DATE

18/11/2021 4:20PM

FOLIO: B/936699

First Title(s): SEE PRIOR TITLE(S)

Prior Title(s): VOL 13067 FOL 9

Recorded -----	Number -----	Type of Instrument -----	C.T. Issue -----
29/7/1989		TITLE AUTOMATION PROJECT	LOT RECORDED FOLIO NOT CREATED
21/9/1989		CONVERTED TO COMPUTER FOLIO	FOLIO CREATED CT NOT ISSUED
14/3/2017	AM89161	TRANSFER INCLUDING EASEMENT	EDITION 1

\*\*\* END OF SEARCH \*\*\*

Form: 01TE  
Release: 4-1

# TRANSFER INCLUDING EASEMENT

New South Wales  
Real Property Act 1900



**PRIVACY NOTE:** Section 31B of the Real Property Act 1900 (RP Act) authorises the Registrar General to collect the information required by this form for the establishment and maintenance of the Real Property Act Register. Section 98B RP Act requires that the Register is made available to any person for search upon payment of a fee, if any.

## STAMP DUTY

Office of State Revenue use only

Office of State Revenue (NSW)  
Client No: 1399387 4568  
Duty: \$10- Trans No: 8971848-001  
Asst details: 3/1/17

## (A) TORRENS TITLE

E [REDACTED]

## (B) TENEMENTS

Servient B/936699 Dominant Easement in Gross pursuant to section 88A of the Conveyancing Act 1919

## (C) LODGED BY

Document Collection Box 256L Name, Address or DX, Telephone, and Customer Account Number if any  
LLPN 123167 X DX 1293 SYDNEY 02 9232 2077

CODE

TE

## (D)

[REDACTED]

(E) As regards the above land: the transferor acknowledges receipt of the consideration of \$ 1,300,000.00 ; transfers  
(F) to the transferee an estate in fee simple; and GRANTS an easement as set out in Schedule 1.  
(G) Encumbrances (if applicable): RESERVES

## (H) TRANSFEE

C [REDACTED] 3

## (I)

TENANCY:

(J) DATE 21/12/2016

I certify that I am an eligible witness and that an authorised officer of the transferor signed this dealing in my presence. [See note\* below].

Signature of witness:

Name of witness:

JESIE CHANG

Address of witness:

1 SMITH STREET  
PARRAMATTA NSW

Certified correct for the purposes of the Real Property Act 1900 by the authorised officer named below.

Signature of authorised officer:

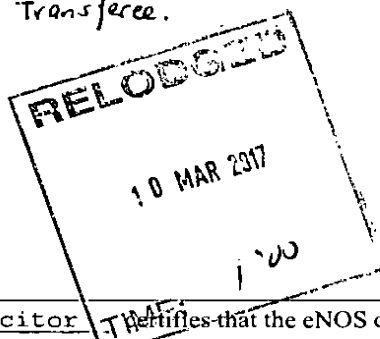
Authorised officer's name:

Authority of officer:

Signing on behalf of:

Sydney Water Corporation

For certification by Transferee.  
see Annexure "B".



Certified correct for the purposes of the Real Property Act 1900 on behalf of the transferee by the person whose signature appears below.

Signature:

Signatory's name:

Signatory's capacity:

solicitor

Transferee

(K) The transferee's solicitor certifies that the eNOS data relevant to this dealing has been submitted and stored under eNOS ID No. [REDACTED] Full name: [REDACTED] Signature: [REDACTED]

\* s117 RP Act requires that you must have known the signatory for more than 12 months or have sighted identifying documentation.

ALL HANDWRITING MUST BE IN BLOCK CAPITALS

Form: 01TE

**(L) SCHEDULE 1**

**Grant of easement**

The transferor GRANTS:

**(M) SCHEDULE 2**

**Reservation of easement**

The transferor RESERVES:

See Annexure "A"

**ANNEXURE "A" TO THE TRANSFER INCLUDING EASEMENT BETWEEN  
SYDNEY WATER CORPORATION AS TRANSFEROR AND CAMPSIE RSL SUB-  
BRANCH LIMITED AS TRANSFEREE**

**DATED:**

An E [REDACTED]  
t [REDACTED] on the terms contained in Memorandum AE292285 filed at  
Land & Property Information and, for the purposes of this easement, Memorandum  
AE292285 is modified as follows:

1. Delete clauses 4.1.5 and 5.
2. Insert the following clause:

"4.1.5 place, erect or construct or allow to be placed, erected or  
constructed upon the Land any building or other structure other  
than the building existing as at the date of this Transfer Including  
Easement, being an outside smoking area and bistro for Campsie  
RSL constructed in accordance with Sydney Water Corporation  
Approval dated 23 April 2007."

Executed on behalf of Campsie  
RSL Sub-Branch Club Ltd in  
accordance with section 127 of  
the Corporations Act 2001 (Cth):

Signature

CORDON BRIAN

Name of Director

NEVILLE MOLONEY

Signature

Name of Director/Secretary

SIGNED FOR AND ON BEHALF OF  
SYDNEY WATER CORPORATION

[Signature]

SIGNED FOR AND ON BEHALF OF  
CAMPSIE RSL SUB-BRANCH CLUB  
LIMITED BY ITS SECRETARY

[Signature]  
Barthip Jones Wade


**ANNEXURE "B" TO THE TRANSFER INCLUDING EASEMENT BETWEEN SYDNEY WATER CORPORATION AS TRANSFEROR AND CAMPSIE RSL SUB-BRANCH CLUB LIMITED AS TRANSFEREE**

**Certification by Transferee**

Certified correct for the purposes of the Real Property Act 1900 and executed on behalf of the company named below by the authorised persons whose signatures appear below pursuant to the authority specified:


Company: Campsie RSL Sub-Branch Club Limited ABN 42 001 044 373

Authority: Section 127 of the Corporations Act 2001

  
\_\_\_\_\_  
Signature of authorised person

GORDON BRIAN  
\_\_\_\_\_  
Name of authorised person

DIRECTOR  
\_\_\_\_\_  
Office held

  
\_\_\_\_\_  
Signature of authorised person

Neville Moloney  
\_\_\_\_\_  
Name of authorised person

DIRECTOR  
\_\_\_\_\_  
Office held



FOLIO: B/936699

SEARCH DATE	TIME	EDITION NO	DATE
18/11/2021	4:19 PM	1	14/3/2017

LAND

LOT B IN DEPOSITED PLAN 936699  
AT CAMPSIE  
LOCAL GOVERNMENT AREA CANTERBURY-BANKSTOWN  
PARISH OF ST GEORGE COUNTY OF CUMBERLAND  
TITLE DIAGRAM DP936699

FIRST SCHEDULE

CAMPSIE RSL SUB-BRANCH CLUB LIMITED

(TE AM89161)

SECOND SCHEDULE (1 NOTIFICATION)

1 AM89161 EASEMENT FOR STORMWATER DRAINAGE PURPOSES AFFECTING  
THE WHOLE OF THE LAND ABOVE DESCRIBED

NOTATIONS

UNREGISTERED DEALINGS: NIL

\*\*\* END OF SEARCH \*\*\*

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## Appendix D

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### Historical Aerial Photographs

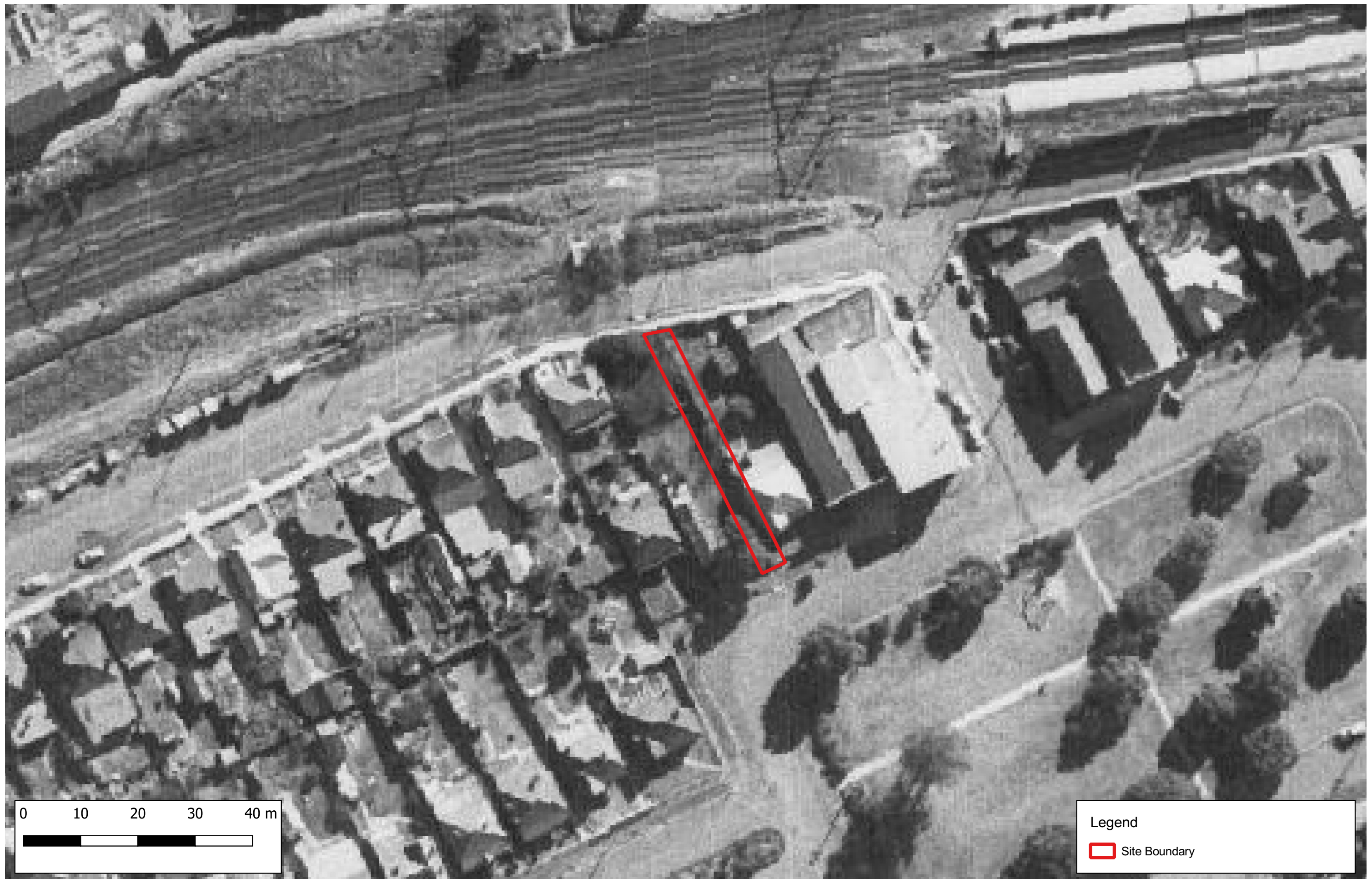




















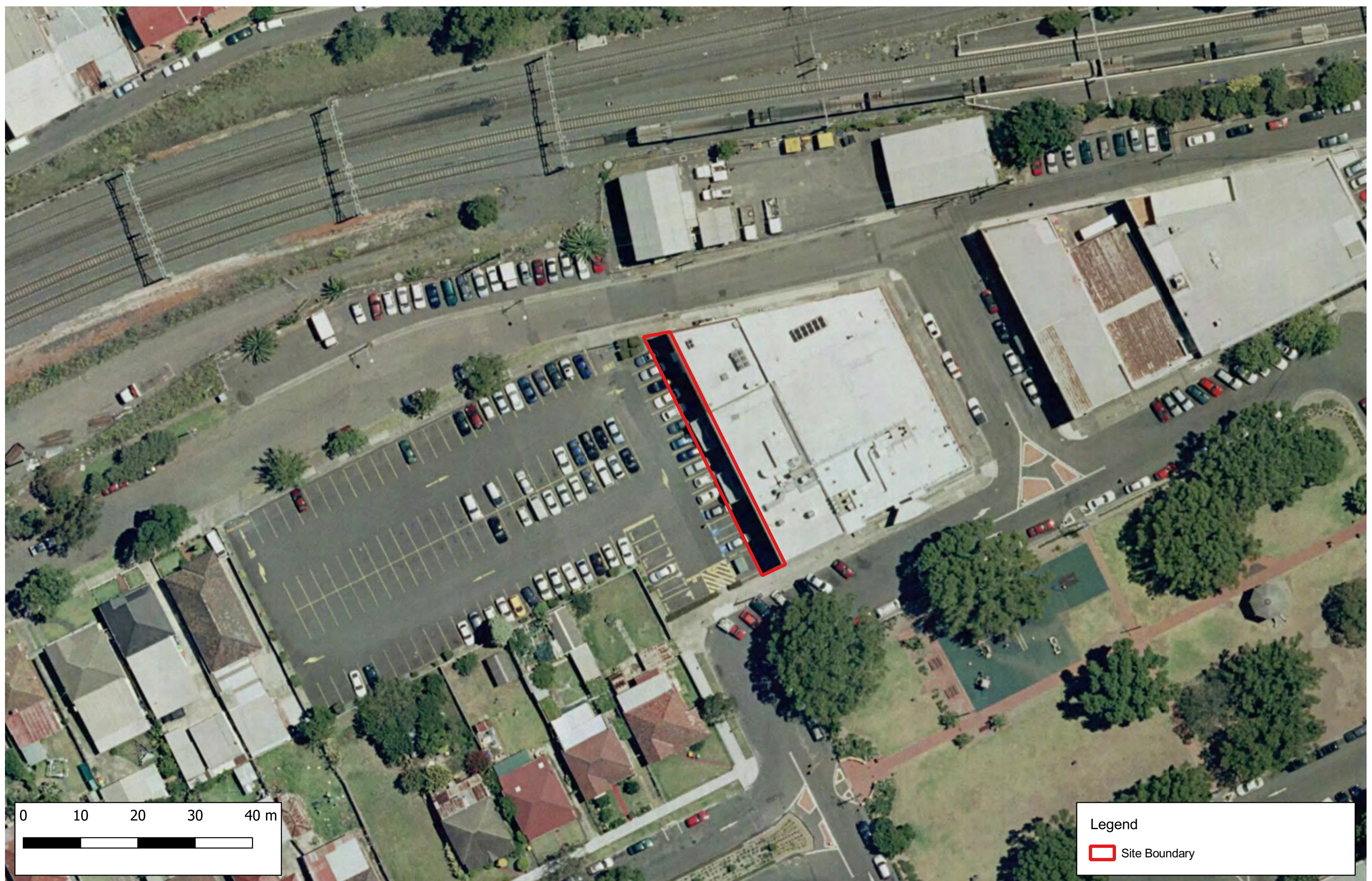




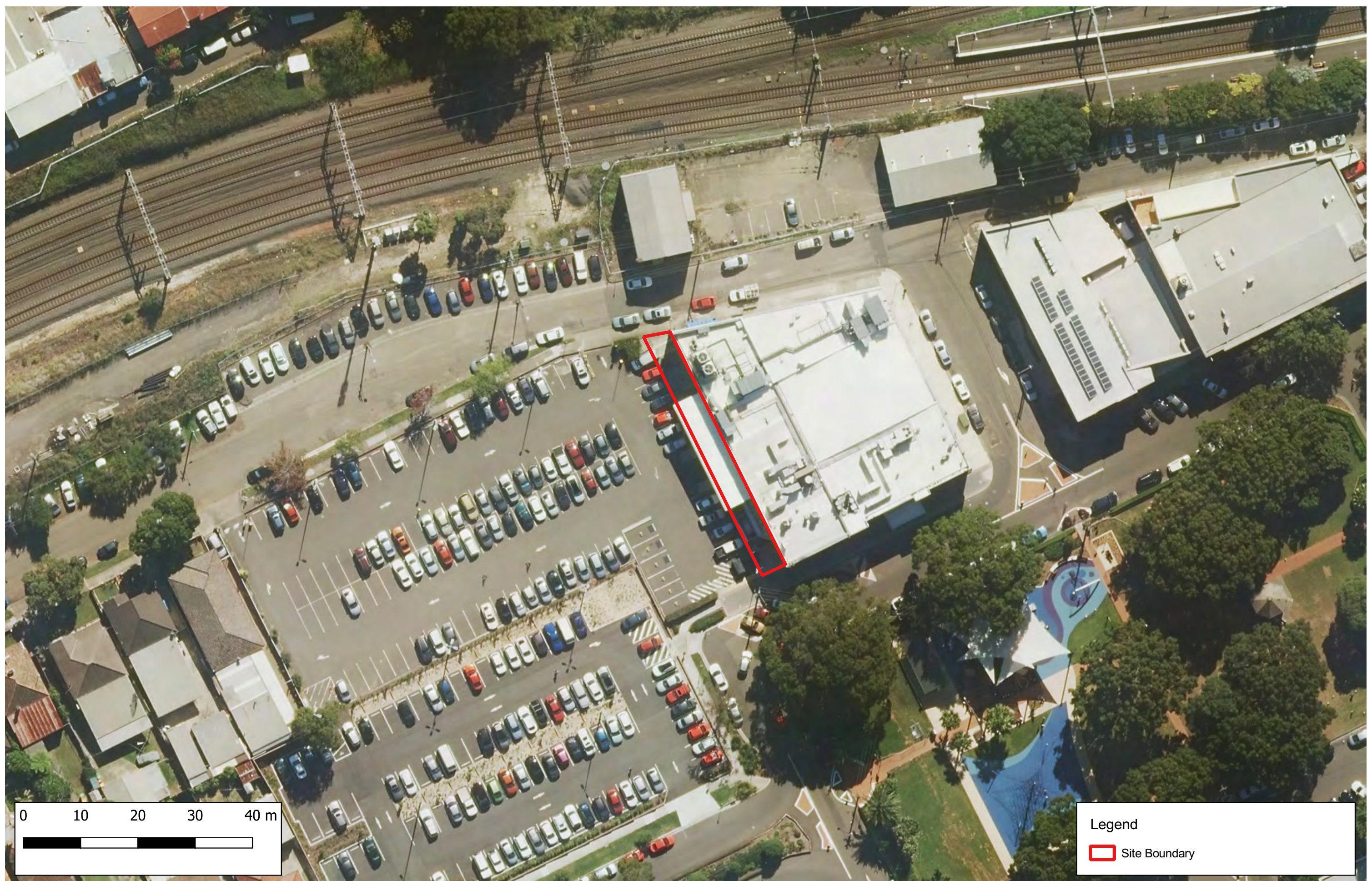














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## Appendix E

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SafeWork NSW Hazardous Chemicals Search  
[not available at the time of reporting]

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## **Appendix F**

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### Council Planning Certificates and Records

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**Lot B DP 936699**

**25-31 Anglo Road, CAMPSIE NSW 2194**

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**Lot B DP 936699**

**25-31 Anglo Road, CAMPSIE NSW 2194**

**PART 1:  
ENVIRONMENTAL PLANNING INSTRUMENTS**

**1.1      Principal Environmental Planning Instrument**

**Canterbury Local Environmental Plan 2012**

Date effective from

**1 January 2013**

Land Use Zone

**ZONE SP2    INFRASTRUCTURE**

**1.      Permitted without consent**

Roads

**2.      Permitted with consent**

Aquaculture; The purpose shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose.

**3.      Prohibited**

Any development not specified in item 1 or 2

*The above information will assist in determining how the subject land may be developed. It is recommended that you read this section in conjunction with a full copy of any relevant environmental planning instrument as there may be additional provisions that affect how the land may be developed.*



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**Note:** The following information indicates those State Environmental Planning Policies (SEPP) which may apply to the subject land. A summary explanation of each SEPP can be sourced from the Department of Planning, Industry and Environment (DPIE) website at [www.planning.nsw.gov.au](http://www.planning.nsw.gov.au). The full wording of each SEPP can also be accessed via the DPIE website.

**State Environmental Planning Policies:**

No. 19 - Bushland in Urban Areas  
No. 21 - Caravan Parks  
No. 33 - Hazardous and Offensive Development  
No. 50 - Canal Estates  
No. 55 - Remediation of Land  
No. 64 - Advertising and Signage  
No. 65 - Design Quality of Residential Apartment Development  
State Environmental Planning Policy (Affordable Rental Housing) 2009  
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004  
State Environmental Planning Policy (Coastal Management) 2018  
State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017  
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008  
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004  
State Environmental Planning Policy (Infrastructure) 2007  
State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) 2007  
State Environmental Planning Policy (Primary Production and Rural Development) 2019  
State Environmental Planning Policy (State and Regional Development) 2011  
State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017

**Proposed State Environmental Planning Policies**

Not applicable

**1.3 Proposed Environmental Planning Instruments (including any Planning Proposals) that are or have been the subject of community consultation or on public exhibition under the Act**

The land is affected by Planning Proposal (PP\_2019\_CBANK\_005) which has been placed on public exhibition. The Planning Proposal seeks to produce a single set of planning rules for the Canterbury Bankstown Local Government Area and to implement key actions of current land use strategies.

**1.4 Development Control Plans**

**CANTERBURY DEVELOPMENT CONTROL PLAN 2012**

Contains detailed design guidelines and development standards for development in the former Canterbury City.

**1.5 Contribution Plans**

**CANTERBURY DEVELOPMENT CONTRIBUTIONS PLAN 2013**

Development Contributions Plan prepared and adopted under the Environmental Planning and Assessment Act, 1979 and Environmental Planning and Assessment Regulation 2000.

The land is not affected by a heritage item or within a heritage conservation area under the relevant Principal Environmental Planning Instrument.

**2.2 Mine Subsidence**

The subject land is not within a mine subsidence district within the meaning of Section 20 of the *Coal Mine Subsidence Compensation Act 2017*.

**2.3 Road Widening and Road Realignment**

*Whether or not the land is affected by a road widening or road realignment proposal under Division 2 or Part 3 of the Roads Act 1993 or an environmental planning instrument;*

The land is not affected by a road widening or road realignment proposal under Division 2 or Part 3 of the Roads Act 1993, or an environmental planning instrument.

*Whether or not the land is affected by a road widening or road realignment proposal under any resolution of Council.*

The land is not affected by a road widening or road realignment proposal under any resolution of Council.

**2.4 Council and Other Public Authority Policies on Hazard Risk Restrictions**

*Whether or not the land is affected by a policy adopted by Council or adopted by any other public authority (and notified to the Council for the express purpose of its adoption by that authority being referred to) that restricts the development of the land because of the likelihood of:*

- **Land Slip**

The land is not affected by a policy restriction relating to landslip

- **Bushfire**

Not applicable

- **Tidal Inundation**

The land is not affected by a policy restriction relating to tidal inundation

- **Subsidence**

The land is not affected by a policy restriction relating to subsidence

- **Acid Sulfate Soils**

The land is affected by the Acid Sulfate Soils Assessment Guidelines and Acid Sulfate Soils Planning Guidelines adopted by the Department of Planning, Industry & Environment and the NSW Office of Environment & Heritage and notified to the Council that restricts the development of the land because of the likelihood of acid sulfate soils.

- **Unhealthy Building Land**

The land is not affected by a policy restriction relating to Unhealthy Building Land.

- **Any Other Risk**

Not applicable.

The land, or part of the land, **is within** the flood planning area (FPA) and consequently the probable maximum flood (PMF).

The land, or part of the land, **is subject to** flood related development controls.

Please note that a Stormwater Systems Report (SSR) will be required from Council (cost applies) to further understand constraints that may relate to development of the property. An SSR can be ordered online from Council's website.

You are advised to refer to the following:

- The relevant Development Control Plan (noted in Section 1.4 of this certificate) for further information on Council's approach to Flood Risk Management, and
- Frequently Asked Questions and details on the study relevant to your catchment area are available at Council's Floodplain Management webpage (<https://cb.city/flooding>).

**NB:** The FPA is the 1% Annual Exceedance Probability (AEP) plus generally a 0.5m freeboard or as outlined in relevant Development Control Plan.

**2.6 Matters arising under the Contaminated Land Management Act, 1997.**

Council is not aware of the land being affected by any matters as prescribed by Section 59 (2) of the *Contaminated Land Management Act 1997*.

Please refer to the *NSW Environmental Protection Agency (EPA)* for more information.

**2.7 Land Reserved For Acquisition**

There is no environmental planning instrument, or proposed environmental planning instrument, applying to the land that makes provision for the acquisition of the land (or any part thereof) by a public authority, as referred to in Section 3.15 of the Environmental Planning and Assessment Act 1979.

**2.8 Property Vegetation Plans**

Not applicable

**2.9 Orders under Trees (Disputes Between Neighbours) Act 2006**

Not applicable

**2.10 Directions under Part 3A**

Not applicable

**2.11 Site Compatibility Certificates and Conditions for Seniors Housing**

Not applicable

**2.12 Site Compatibility Certificates for Infrastructure**

Not applicable

**2.13 Site Compatibility Certificates and Conditions for Affordable Rental Housing**

Not applicable

**2.14 Annual charges under Local Government Act 1993 for coastal protection services that relate to existing coastal protection works**

Not applicable

**2.15 Biodiversity Certified Land**

Not applicable

**2.16 Paper Subdivision Information**

Not applicable

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Not applicable

**2.18 Loose-Fill Asbestos Ceiling Insulation**

Not applicable

**2.19 Affected Building Notices and Building Product Rectification Orders**

Not applicable

**2.20 State Environmental Planning Policy (Western Sydney Aerotropolis) 2020**

Not applicable

**2.21 Complying Development**

*Whether or not the land is land on which complying development may be carried out under each of the Codes for complying development because of the provisions of clauses 1.17A(1) (c) to (e), (2), (3) and (4), 1.18(1)(c3) and 1.19 of State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 and, if no complying development may be carried out on that land under that Policy, the reasons why complying development may not be carried out on that land. **Note that in order for complying development to be able to be carried out, it must be permissible in the relevant zone in the first place.***

<b>Housing Code (if in a residential zone)</b>	Yes
<b>Rural Housing Code (if in a rural residential zone)</b>	Not applicable
<b>Low Rise Housing Diversity Code</b>	Yes
<b>Housing Alterations Code</b>	Yes
<b>General Development Code</b>	Yes
<b>Greenfield Housing Code</b>	Not applicable
<b>Inland Code</b>	Not applicable
<b>Commercial and Industrial (New Building and Alterations) Code</b>	Yes
<b>Commercial and Industrial Alterations Code</b>	Yes
<b>Container Recycling Facilities Code</b>	Yes
<b>Demolition Code</b>	Yes
<b>Subdivision Code</b>	Yes
<b>Fire Safety Code</b>	Yes

**Important Disclaimer:** This clause of the Certificate only contains information in respect of that required by clause 3 of Schedule 4 of the Environmental Planning and Assessment Regulation 2000, in relation to Complying Development under State Environmental Planning Policy (Exempt and Complying Development Codes) 2008. Other provisions contained in the SEPP, including but not limited to, minimum allotment size requirements, specified development standards or any other general exclusions, may preclude Complying Development under the SEPP from being able to be carried out. You will need to refer to the SEPP for complete details. It is your responsibility to ensure that you comply with all other general requirements of the SEPP. Failure to comply with these provisions may mean that any Complying Development Certificate issued under the provisions of the SEPP is invalid.

## **OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT, 1979.**

**Note:** When information pursuant to Section 10.7(5) is requested the Council is under no obligation to furnish any of the information supplied herein pursuant to that Section. Council draws your attention to Section 10.7(6), which states that a Council shall not incur any liability in respect of any advice provided in good faith pursuant to sub-section (5). The absence of any reference to any matter affecting the land shall not imply that the land is not affected by any matter not referred to in this Certificate.

### **3.1 Additional Flood Planning Advice**

In addition to Section 2.5 of this certificate, the following information may assist in interpreting the DCP:

Not applicable.

### **3.2 Tree Preservation Order**

A tree preservation order applies to the whole of the City of Canterbury Bankstown.

### **3.3 Council Policy on Contaminated Land**

On 22 August 2017 Council adopted a policy on contaminated land. This policy will restrict development of land:

- a) which is affected by contamination;
- b) which has been used for certain purposes;
- c) in respect of which there is not sufficient information about contamination;
- d) which is proposed to be used for certain purposes;
- e) in other circumstances contained in the policy.

### **3.4 General Advice Regarding Use of Property**

Persons considering commencing a use of or purchasing a property are advised to seek confirmation that the current, or intended, use (as the case may be) has been approved by Council, or does not require Council approval. It is pointed out that the question of “existing use rights” within the meaning of the Environmental Planning and Assessment Act, 1979, is a complex matter, and that the commencement of a use without Council approval (where required) is unlawful and may be subject to enforcement action.

### **3.5 Other Matters**

Not applicable.



**MITCHELL NOBLE  
MANAGER SPATIAL PLANNING**



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## Appendix G

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Site Photographs



Photograph 1: Electrical transformer box



Photograph 2: Underground utilities access hatch





Photograph 3: Underground Utilities (Stormwater and Gas)



Photograph 4: Construction Site office, generator and refrigerated cargo containers






Photo 5: Pavement Lilian Street (north of site)



Photo 6: Sydney Metro south Campsie maintenance depot

		<b>Site Photographs</b>		PROJECT:	208123.00
		<b>Preliminary Site Investigation (Contamination)</b>		PLATE No:	3
		Part of 25 Anglo Road, Campsie		REV:	1
		CLIENT	Canterbury Bankstown Council	DATE	29/11/2021

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## Appendix H

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Risk Matrix



## Appendix H

### Risk Rating Matrix

The overall risk rating for the site has been determined by using the approach outlined in Tables H1 and H2 below. The risk matrix is based on:

- Probability of occurrence of each potential area of environmental concern (AEC), and / or contamination resulting from the potential AEC, based on the desktop site history and characterisation review, and
- Consequences of the AEC and / or contamination resulting from the AEC, which have been estimated on the basis of the contaminant type(s), likely impacted media, contaminant migration potential and prior project experience for similar sites. For the purpose of the risk rating, the contamination affects on human health and ecology have not been considered.

The risk rating is calculated using the formula: Risk Rating = Probability x Consequence. The final risk rating for the site has then been given by the maximum risk rating of all AECs. If contamination has already occurred, the risk rating is considered high irrespective of probability and consequence.

**Table H1: Qualitative Probabilities and Consequences**

Item	Description	Value
<b>Probability</b>	AEC / contamination will not occur	1
	AEC / contamination unlikely to occur	2
	AEC / contamination may occur	3
	AEC / contamination likely to occur	4
	AEC / contamination will occur	5
<b>Consequence</b>	Minimal impact not felt at source	1
	Impact limited to soil, and localised	2
	Widespread soil impact	3
	Impacts on multiple media (soil, groundwater, and soil vapour) but limited to site boundary	4
	Impacts on multiple media (soil, groundwater, and soil vapour) beyond the site boundary	5

**Table H2: Risk Matrix**

		Consequence				
		1	2	3	4	5
<b>Probability</b>	1	1	2	3	4	5
	2	2	4	6	8	10
	3	3	6	9	12	15
	4	4	8	12	16	20
Risk 1-6=		Low				
Risk 7-12=		Medium	≥9 = medium-high risk			
Risk 13-20=		High				

**Douglas Partners Pty Ltd**