

McCrae Landslide

Causation

PSM5665-075R 21 July 2025

PRIVILEGED AND CONFIDENTIAL

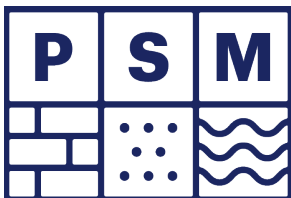


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Appendix A Brief

Appendix B CV

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Appendix I Stability Analysis Results

1. Introduction

1. This report provides my opinion on causes of a series of landslides that have impacted multiple properties at McCrae. The landslides occurred at different times and include:
 - (a) A landslide event on 14 and 15 November 2022, referred to herein as the “**2022 Landslide**”.
 - (b) Two landslides that occurred on 5 and 14 January 2025 on the escarpment slope immediately below properties located at 6 View Point Road and 10-12 View Point Road. These two landslides are referred to herein as “**the 2025 Landslides**”.
2. On 17 January 2025 an evacuation order (**EO**) area (referred to herein as “**the EO Area**”) was established in encompassing the 19 properties surrounding the January 2025 Landslides with independent contributions from two parties:
 - (a) The Victorian State Emergency Service (**SES**) who established the initial EO area which encompassed 11 properties.
 - (b) Municipal Building Surveyors of Mornington Peninsula Shire Council (**MPSC**) who extended the EO Area at that time to 19 properties.
3. The properties impacted by the EO Area are highlighted in Figure 1. The extent of my study area includes from an area near the Boulevard, south of the Mornington Peninsula Freeway (the **MPF**) down to Port Phillip Bay adjacent to Point Nepean Road, Figure 1. This broad area is referred to as “**the Site**”. The location of the 2022 Landslide and the 2025 Landslides are highlighted in Figure 2.
4. I have been requested to prepare this report by Bronwyn Weir of Weir Legal and Consulting (**WL**), who act for MPSC.
5. My brief was provided by WL on 6 June 2025 and is included in Appendix A. Supporting documents have been supplied by MPSC and Harwood Andrews since October 2023 and more recently from January 2025 onwards.
6. This report has been prepared by Mr Dane Pope; resume attached in Appendix B. I have 19 years of experience in the Civil and Mining industries with the following experience I consider relevant to this project:
 - (a) My ongoing engagement on the 2022 Landslide matter since November 2023.
 - (b) Bogong Village temporary access cut in deeply weathered granite.
 - (c) Deviation Road landslide risk assessment of a significant escarpment with an extensive history of landsliding events.
 - (d) Cliff Road landslide risk assessments, Frankston.
 - (e) Great Ocean Road and inland routes landslide slope remediation projects.
7. In preparing this report I have been provided with a copy of the Expert Witness Code of Conduct (refer to the Brief) and the VCAT Practice Note (PNVCAT2). I have read both the Expert Witness Code of Conduct and the VCAT Practice Note and agree to be bound by them. Although I have made significant enquiries into this matter, there are still active investigations underway that may be of significance to my opinions. This report is a working document that has been submitted based on a pre-set deadline by the Board of Enquiry. My opinions may need to be revised once all my investigations are complete and which includes:
 - (a) Ongoing groundwater monitoring.
 - (b) Testing of stormwater systems.
 - (c) Groundwater and surface water chemistry testing.
8. My report only includes information and opinions that have not been reported elsewhere. For consistency I have used geotechnical terms adopted in the PSM reports outlined in Table 2. For example, the geotechnical units identified in Section 3.2 and Table 3 of the PSM LRA have been adopted throughout my report.

1.1 Definitions and Abbreviations

9. Definitions and abbreviations used in this report are provided in Table 1.

Table 1 – Definitions and abbreviations

| Abbreviation/Term | Abbreviation Description or Definition |
|---------------------------------|---|
| 2022 Landslide | A landslide event that initiated on 10-12 View Point Road near the western property boundary between 14 to 15 November 2022 |
| The 2025 Landslides | Two landslides that occurred on 5 and 14 January 2025 on the escarpment slope immediately below properties located at 6 View Point Road and 10-12 View Point Road |
| 2022 RW | A retaining wall constructed on 10-12 View Point Road at some time in 2022 near the location of the 2025 Landslides |
| 2024 RW | A retaining wall constructed on 10-12 View Point Road at some time in 2024 near the location of the 2025 Landslides |
| AC | Asbestos Cement |
| AHD | Australian Height Datum |
| Antecedent Rainfall | The rainfall that occurs before a specific event, like a flood or landslide, or a particular time period of interest |
| AS | Australian Standard |
| AS4678 (2002) | Australian Standard for Earth Retaining Structures |
| BH | Borehole |
| CCTV | Closed-Circuit Television |
| CPT | Cone Penetration Test |
| CRB | Country Roads Board |
| DCP | Dynamic Cone Penetration |
| DDO | Design and Development Overlay |
| Dromana to Portsea water main | A 900 mm diameter water main |
| DTP | The Department of Transport and Planning |
| EO | Evacuation Order |
| EO Area | A series of properties evacuated in response to the 2025 Landslides |
| FH | Fulton Hogan |
| FOI | Freedom of Information |
| FOS | Factor of Safety |
| GIS | Geographic Information System |
| GFR | Geotechnical Factual Report |
| LiDAR | A method of aerial survey completed by a drone or aeroplane |
| LRA | Landslide Risk Analysis |
| Margaret Street Drain | A natural gully that was backfilled between now 23 Coburn Avenue and 8 Margaret Street, McCrae |
| MBS | Municipal Building Surveyor |
| MPF | Mornington Peninsula Freeway |
| MPSC | Mornington Peninsula Shire Council |
| NCC | National Construction Code |
| NDT | Non Destructive Testing |
| NDD | Non Destructive Drilling |
| Outlook Road Water Main Failure | A South East Water main that failed at some time in 2024 in a reserve near Outlook Road and Bayview Road, McCrae |
| Pointerra Reality Model | A three dimensional photogrammetry model of the 2025 Landslides |
| Reln Drain | A proprietary type of effluent disposal trench with a plastic arch |
| RL | Reduced Level |

| Abbreviation/Term | Abbreviation Description or Definition |
|-------------------|---|
| RW | Retaining Wall |
| SES | State Emergency Service |
| SEW | South East Water |
| SPT | Standard Penetration Testing reported in an “N” value which is blows per 300 mm penetration |
| WL | Weir Legal and Consulting |

2. Work Undertaken

10. I have undertaken the following work in providing my opinions in this matter:
- I have reviewed the Brief.
 - I prepared the reports listed in Table 2. Contributions from other members of my team are included in those reports.
 - I completed Site inspections on the dates listed in Table 3.
 - I completed select interviews of property owners. A summary of the interviews is provided in Table 4.
 - I assembled my understanding of facts as they relate to the opinions I provide. I have provided an Annexure of these facts in Appendix A. I prepared this information with the assistance of the following staff under my direct supervision:
 - Oliver Stirzaker who assisted with the stormwater and sewer investigation and reporting.
 - Tim Nash who assisted with the engineering geological model for the PSM Landslide Risk Assessment (PSM LRA).
 - Garry Mostyn who is the Technical Director for PSM and the McCrae landslide project. Garry assisted with technical review of the PSM LRA .
 - I have reviewed all work undertaken under my direction, and notwithstanding the assistance provided by my colleagues under my instruction, the opinions in this report are my own and ones that I believe to be true and correct.
 - I considered the question I have been asked to address in the Brief in the light of my experience and understanding of engineering principles.
 - I prepared this report presenting my opinions.

Table 2 – PSM reports

| Report Title | File Name | Abbreviation | Revision | Date |
|---|--------------|-------------------------------|------------|--------------|
| GFR | PSM5665-GFR | PSM GFR | Rev0 | 9 April 2025 |
| LRA | PSM5665-LRA | PSM LRA | Rev1 | 28 May 2025 |
| McCrae Landslide – Stormwater and Sewer Investigation Geotechnical Factual Report | PSM5665-070R | - | DRAFT RevA | 13 June 2025 |
| Expert Opinion Report – Rectification 10-12 View Point Road, McCrae | PSM5226-005R | PSM 2022 Rectification Report | Rev0 | 11 June 2024 |
| Expert Opinion Report – Landslide Assessment 10-12 View Point Road, McCrae | PSM5226-006R | PSM 2022 Causation Report | Rev0 | 11 June 2024 |

Table 3 – Site inspections by or on behalf of Dane Pope of PSM

| Date | Comment |
|------------|--|
| 23/11/2023 | Inspection of 2022 Landslide area. Completed by Associate Geotechnical Engineer of PSM. |
| 6/01/2025 | Inspection of 05/01/2025 landslide. Measurement of flow of water from landslide. |
| 14/01/2025 | Inspection of 14/01/2025 landslide. Access to 10-12 View Point Road not permitted. |
| 15/01/2025 | Inspection of EO Area properties. General walkover to inspect seepage in community. |
| 16/01/2025 | Inspection of EO Area properties. General walkover to inspect seepage in community. MPSC test pit in sewer trench on Charlesworth Street. |
| 20/01/2025 | Inspect 2022 Landslide area. Surface water sampling with JBSG. |
| 21/01/2025 | 6 View Point Road, 10-12 View Point Road. |
| 24/01/2025 | IDS Radar install. Inspect SEW test pit on Charlesworth Street. Sampling adjacent to 2022 Landslide. |
| 30/01/2025 | Outlook Road, Bayview Road visit. Walkover of The Boulevard. |
| 10/02/2025 | EO Area walkover with Municipal Building Surveyor (MBS), David Kotsiakos. |
| 11/02/2025 | 6 View Point Road. |
| 12/02/2025 | 6 View Point Road, 10-12 View Point Road. Dye tracing at NDT01. |
| 17/02/2025 | Margaret Street and Coburn Avenue stormwater outlets at the bay. Confirmation of dye testing at NDT01. |
| 21/02/2025 | Bayview road water main failure – detailed walkover. Identification of possible leak in water main at repair site. General pits and pipes in the area. |
| 27/02/2025 | 10-12 View Point Road. |
| 28/02/2025 | 10-12 View Point Road. Identify possible ReIn drains with Ground Penetrating Radar. |
| 03/03/2025 | Dye tracing of NDT02. |
| 07/03/2025 | Pile testing at 6 View Point Road. |
| 20/03/2025 | ReIn drain hand augers, dye tracing at BH01A. Inspection of Coburn avenue repairs. |
| 02/04/2025 | Escarpment walkover. |
| 03/04/2025 | Broad walkover of McCrae. |
| 10/04/2025 | Browne Street defect. EO Area properties. |
| 20/05/2025 | Mapping of 6 View Point Road escarpment exposures. |
| 16/06/2025 | Hand augers on 6 View Point Road. Inspection of eastern flank of 2025 Landslide. Measurement of landslide water flow rate. |

Table 4 – Interviews conducted by Dane Pope of PSM

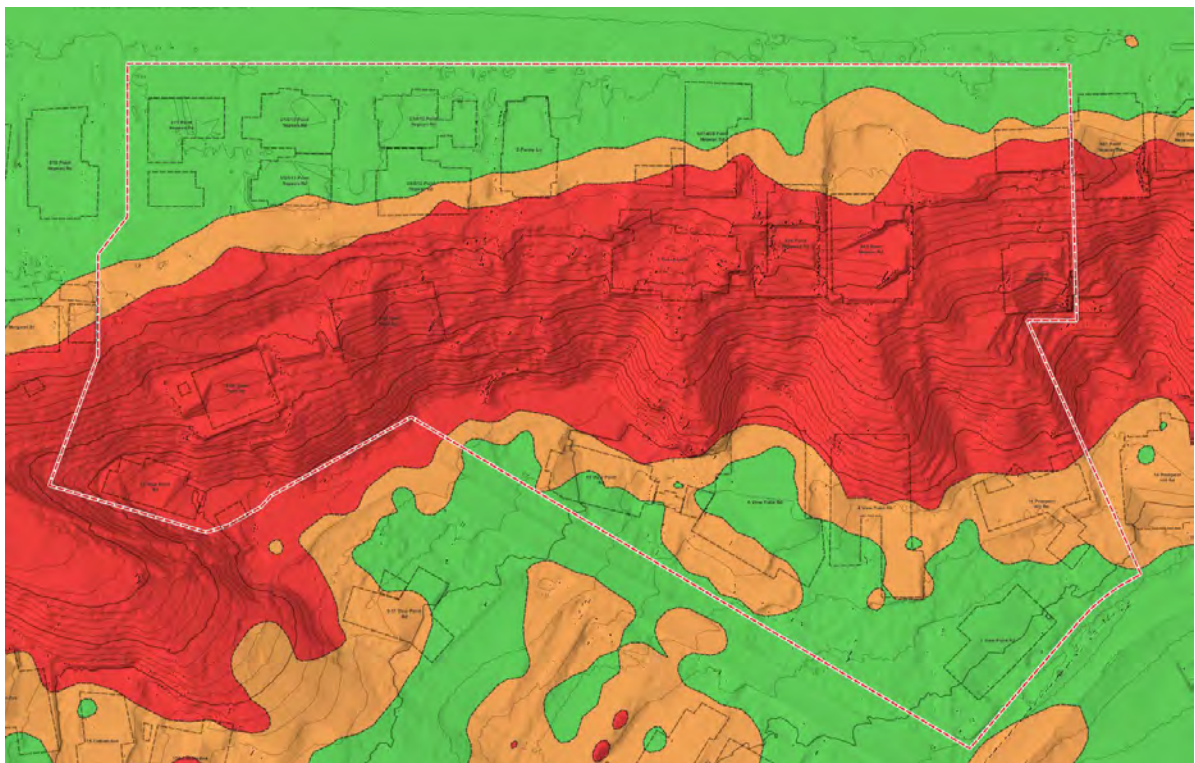
| Date | Address | Comments |
|------------------------|----------------------|---|
| 21 January 2025 | 5 Prospect Hill Road | Property Owner: Groundwater encountered during geotechnical investigation for his dwelling. |
| 1:30pm 2 April 2025 | 4 Margaret Street | Property Owner: Audible noise of stormwater drain stopped approximately two weeks before the 2025 Landslide. Collapse was observed around the stormwater pit in the front garden of the property. |
| 27/02/2025 | 4 View Point Road | Property owner (Richard Bendell): reported surface water flooding in 2017. Sheet flow came down stairs on adjacent property and evacuated topsoils down to 603 Point Nepean Road. Late November 2024 was the loudest that he recalled the stormwater drains in the community. |
| 27/02/2025 | 25 Coburn Avenue | Property Owner (Peter Hurst): “stormwater always running”. Today (27/02/2025) was the quietest he recalled the stormwater. No reported issues with seepage on his property. |
| 15/01/2025 | 34 Coburn Avenue | Property Owner: As wet as they could recall it being. |
| 15/01/2025 | 1 Prospect Hill Road | Property Owner: As wet as they could recall it being. |

3. Document Review

3.1 Published Information

3.1.1 Landslide Susceptibility

11. The published landslide susceptibility for the EO Area is presented in Inset 1 based on the MPSC susceptibility study (Piper & Slade, 2012). It is my understanding that these maps are located within the MPSC GIS.



Inset 1: Excerpt from susceptibility mapping with high susceptibility shown in red – EO Area

3.1.2 Technical Papers Regarding Infiltration Rates

12. I have considered published literature with respect to infiltration rates. This includes:
- (a) Kuok et al (2003)¹ 0.9 to 1.0 mm/hr for a Clay and Clay Loam soils.
 - (b) Diamond et al (1998)²: 0.8 to 11.7 mm/hr for Clayey Loam soils in winter.
 - (c) Dagadu et al (2012)³: 12 mm/hr for a “unploughed” Clay Soil.

3.2 Country Roads Board Records

13. I have relied on the accuracy of Country Roads Board geotechnical borehole logs for the Burrell Road overpass. These logs are included on the “*General Arrangement*” and “*Foundation Layout and Bore Detail and Falsework Clearance*” drawings (Ref. Drawings 121 837 to 121837 (1972). This overpass is now known as the Latrobe Parade bridge. These logs indicate to me that:
- (a) Surficial CLAY/SAND extended to significant depths and with SPT N values typically 50 blows or greater/300 mm.
 - (b) “Sand with granite pieces” is logged between 0.9 to 2.1 m from surface level.
 - (c) Decomposed Granite (what I have called “XW Granite” in Table 3 of the PSM LRA) was 8.4 to 12.8 m below the surface level at the time of that investigation.

3.3 MPSC Factual Data

3.3.1 Digital Terrain Models and Contour Maps

14. I have relied on the accuracy of the following LiDAR surveys and contour maps provided by MPSC:
- (a) 2019 and 2023 LiDAR. Refer to Section 2.5 of the PSM LRA for discussions regarding accuracy of the data sets.
 - (b) The “*Mornington Peninsula Area Base Map Series*” 1957 Cadastral Survey. The survey is presented as a 10ft contour. I note that this plan provides an overview of the MPF easement before it was constructed.

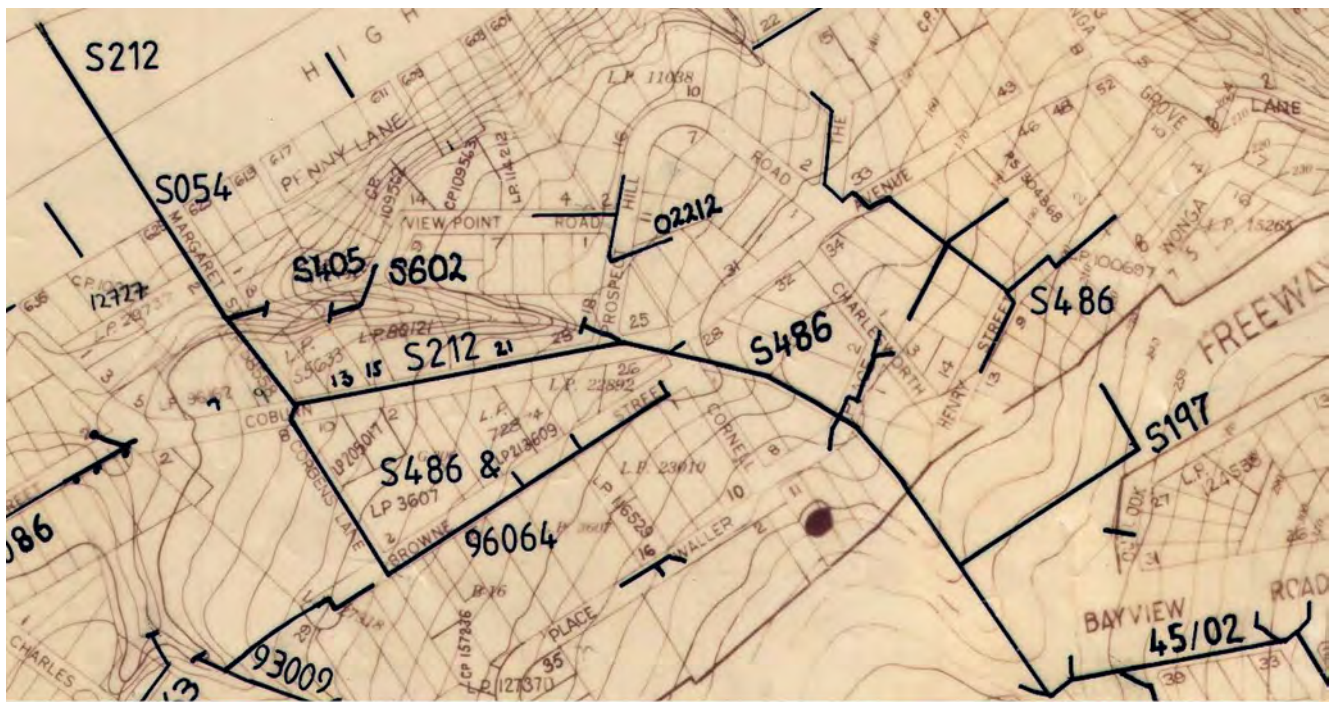
3.3.2 Stormwater Plans

15. I have relied on the accuracy of the MPSC GIS data to inform the general location of stormwater assets. The MPSC stormwater asset shapefiles were provided by MPSC on 4 March 2025. Location of assets are presented in Figure 3.
16. MPSC have provided legacy stormwater plans that are named “108 Base Maps” and are undated. I note that they included stormwater drain locations that were in commission around the time of the construction of the MPF, Inset 2. I have relied on the accuracy of the survey plan and the stormwater drains. I note that the:
- (a) Stormwater drain plans for the MPF are stamped 1972. I have assumed that the stormwater drains were constructed using open trenches.
 - (b) MPSC GIS data supersedes this stormwater data.

¹ Kuok, K. K., Chiu, P. C., Rahman, M. R., Said, K. A. B. M., & Chin, M. Y. (2023). Evaluation of total infiltration and storage capacities for different soil types in Sarawak using SWMM. *Discover Water*, 3(1), 18.

² Diamond, J., Shanley, T., Infiltration rate assessment of some major soils, End of Project Reports, Teagasc, 1998.

³ Dagadu, J. S., & Nimbalkar, P. T. (2012). Infiltration studies of different soils under different soil conditions and comparison of infiltration models with field data. *International Journal of Advanced Engineering Technology*, 3(2), 154-157.



Inset 2: Excerpt of MPSC 108 Base Maps and with stormwater network and 1957 surface contour

3.3.3 Flinders Council Records

17. I have relied on the accuracy of the survey and cadastral surveys in the Shire of Flinders General File SF19997 Parts 5 and 6. Excerpts of these files in Inset 3 and Inset 4 indicate to me:

- (a) The private property that was resumed for the Freeway.
- (b) The residential streets that were changed including Henry Street and Charlesworth Street.
- (c) The location of the drainage paths prior to the construction of the Freeway.



Inset 3: Excerpt from "Shire of Flinders General File SF19997 Part 5 (pdf page 25).



3.3.4 Community Complaints

18. I note that a member of the community posted a photograph on a community forum on Facebook on 21 December 2024 of Charlesworth Street surface water issues, Inset 5. I note that they provided an estimate of how long that this had been observed.



Inset 5: McCrae Village Community Facebook post on 21 December 2024

3.4 MPSC Planning Documents

3.4.1 Development Overlay

19. Schedule 3 to Clause 43.02 Design and Development Overlay (**DDO**) lists a series of general requirements, Inset 6 (DTP, 2025). I note that there is distinction between natural ground level and filling level in dot point four of Inset 6 and that the difference between these two levels must not exceed 1 m. I note that Clause 1.0 Design Objectives of the DDO states *“To ensure that the design of subdivision and housing is responsive to the environment, landform, site conditions and character of coastal villages, hillsides and clifftop areas.*
- To avoid higher densities of development in areas subject to instability, erosion or potential fire hazard and to minimise the extent of required earthworks.”
20. I have assumed that “works” includes construction of retaining walls (**RWs**) and bulk earthworks that result in changes in levels of greater than 1 m at the location of the retaining wall (**RW**) as measured from natural ground to the finished surface level. I have assumed that the changes in levels would include the absolute maximum observed and not an average.

General requirements

- All buildings and works must be located on land with a slope of less than 20 percent.
- Buildings must not be located on a ridge.
- No building may exceed a wall height of 5.5 metres or a building height of 6 metres.
- The difference between finished ground level and natural ground level as a result of excavation and filling must not exceed one metre and must be properly battered or retained.

Inset 6: Excerpt from Schedule 3 to Clause 43.02 Design and Development Overlay

3.4.2 Private Property Documentation

21. I have relied on the accuracy of factual information provided in the MPSC property files which includes dates associated with intrusive investigations. A summary of these files is provided in Table 6.
22. CivilTest report 1150585 (3 December 2015) provides the results of a geotechnical investigation for the proposed extension and garage at 10 -12 View Point Road. I note that:
- (a) The boreholes were drilled on different days (13 July 2015 and 20 August 2015).
 - (b) Borehole 4 was drilled in proximity to the 2024 RW location and natural SAND/CLAY was logged to depths of up to 5 m below surface level on the 20 August 2015. Groundwater was not recorded on the borehole log report.
 - (c) Wet soils were observed in boreholes BH1 at 0.5 to 0.6 m depth on 13 July 2015.
 - (d) Section 9 of the report provides advice regarding slope stability. I have highlighted key sections in red on Inset 7.

9. SLOPE STABILITY:

The site is in an area of Aeolian SAND overlying Devonian granitic CLAYS. The proposed location for the double storey extension and garage will be abutting the steep slopes falling to the north west. Although the site has been classified as CLASS M (AS2870-2011), it is strongly recommended that the foundation of the proposed development on the nearside of the existing cliff edge should be located not less than 5.0 metres away.

Generally in this type of landform, topography, geology and climate zone, the type of landslips that could occur are debris flows, shallow and deep-seated rotational and translational landslides. Due to the sandy nature of the upper soil, shallow surface ravelling and slumping including erosion under high flow velocities, can be expected. No history of past landslide events can be found at this site or the site adjacent. There is negligible evidence of basal curvature in the trees present at this site, or that could be seen on adjoining sites. The slight bending of the trees observed on site is due to the trees reaching for sunlight.

The walkover survey failed to identify any signs of slope instability within the subject site. There is a small gully to the north of the subject site boundary. Although no obvious evidence of recent erosion or scouring of the gully floor and sides was noted, the potential exists for these destabilising actions during heavy storms or following prolonged wet weather. Any excess overland flows collected from the site, including roof overflows/gutters, should be channelled to a legal point of discharge. The existing slope cover consists of natural grasses and native trees and this should be maintained as much as possible to minimise the potential for near surface erosion, slumping and ravelling. It was concluded that the existing site is considered stable on the basis of the above assessment.

The site has a low risk of slope instability and the proposed development should be carried out in a manner that will not impact on the risk of future slope instability. The landslide risk to property and life will be maintained at "Low" subject to the recommendations made in this report. Good hillside practices should be adopted (refer to AGS Appendix G attached) as well as good engineering practices during construction.

Inset 7: Excerpt from CivilTest 1150585 (3 December 2015, pp 5) and with my highlights in red

23. RW drawings have been supplied for 10-12 View Point Road (ref. Rexicon Drawings 23031-S00 to S04, dated 1 June 2023). I note that:
 - (a) The drawings are "Issued for review".
 - (b) The Rexicon drawings reference the geotechnical report by CivilTest (Ref. 1222044-3 Issue 3 (01/06/2023)).
 - (c) The northern most retaining wall is what I refer to as "the 2022 RW" herein. I provided justification of the RW age in Section 4.
 - (d) The footing notes indicate that the "Footings must be founded into the firm natural clay as noted in the soil report".
 - (e) The scope of the CivilTest report related to the November 2022 Landslide, Inset 8.
 - (f) Issue 3 of the CivilTest report 1222044-3 is signed and dated 24 March 2023 and that Issue 4 is dated 6 June 2023.
 - (g) The set out and proposed and existing walls are shown in the drawings, Inset 9.
 - (h) Hand mark ups in blue are in the approximate location of the 2024 RW.
24. I note that CivilTest report 1222044-3 provides advice regarding review of the structural engineering design and footing inspections to validate the soil profile, Inset 10.
25. I have assumed that Rexicon Consulting Engineers have relied on geotechnical advice provided in the CivilTest report 1222044-3 to design the RW outlined in Rexicon Drawings 23031-S00 to S04 (dated 1 June 2023).

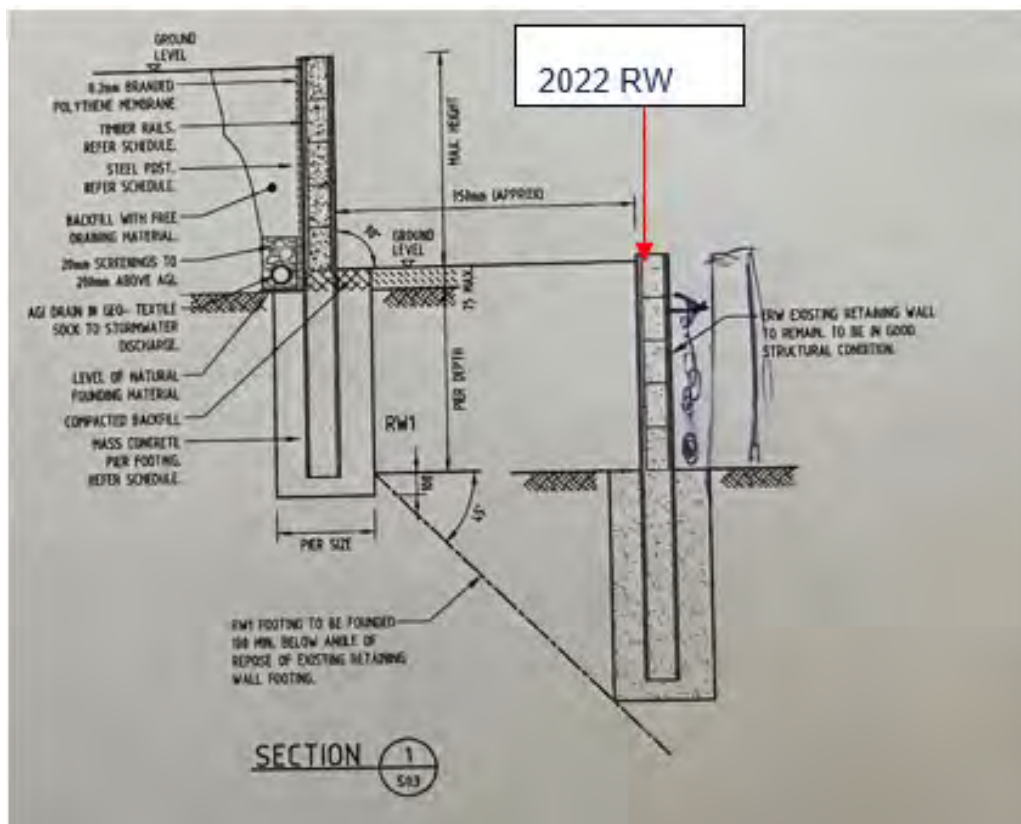
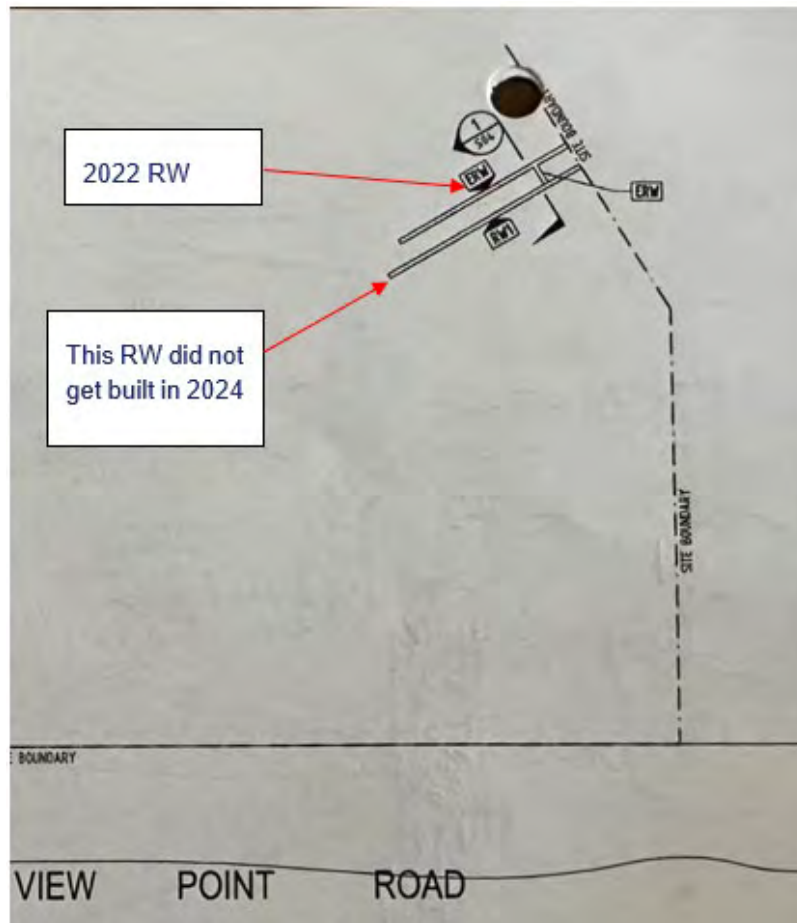
1. INTRODUCTION:

Civiltest Pty Ltd was engaged by the client to carry out a geotechnical investigation for this site. This report details the earthworks recommendations to make the site safer following the landslip event which occurred on 15 November 2022. The following information was considered in this assessment:

- Observations made by Civiltest during the 29 November and 2 December 2022 site walkovers, as detailed in the previous report 1222044-1.
- Desktop study conducted and outlined in report 1222044-1, including geology, groundwater conditions and rainfall statistics.
- Borehole and laboratory data collected from the field investigation carried out by Civiltest on 1 March 2023

This report aims to provide an assessment of the stability of the slope at this site under the current conditions, and under the conditions after remediation. Note that several assumptions have been made with respect to the engineering properties of the soil units encountered and these may have a significant bearing on the outcome of the assessment.

Inset 8: Excerpt from CivilTest Report 1222044-3 (24/03/2023)



Inset 9: Excerpt from RW drawings for the 2025 Landslide area with my mark up in red. The author of the hand mark ups in blue are unknown and are in the location of the 2024 RW.

If the client can confirm the proposed slope remediation method, further analysis can be conducted and pile capacity and spacings analysed in Section 3.3 (modelling). The design failure mode is illustrated in Figure 6.4 below. The structural engineering design should be reviewed by Civiltest to ensure that it is suitable.

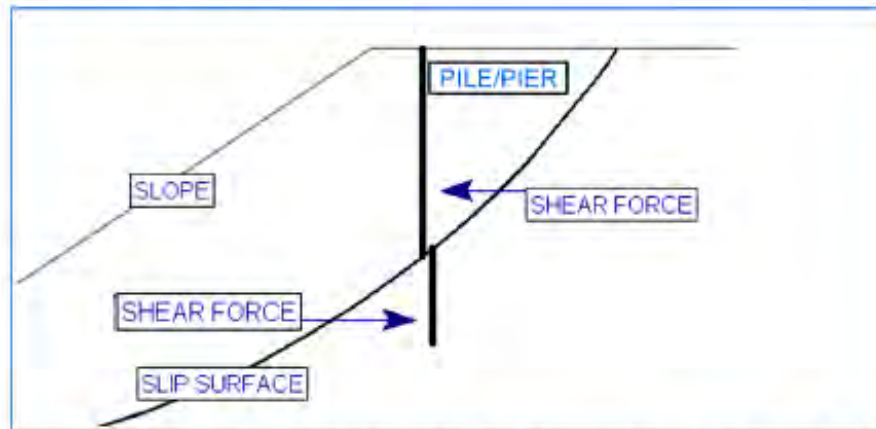
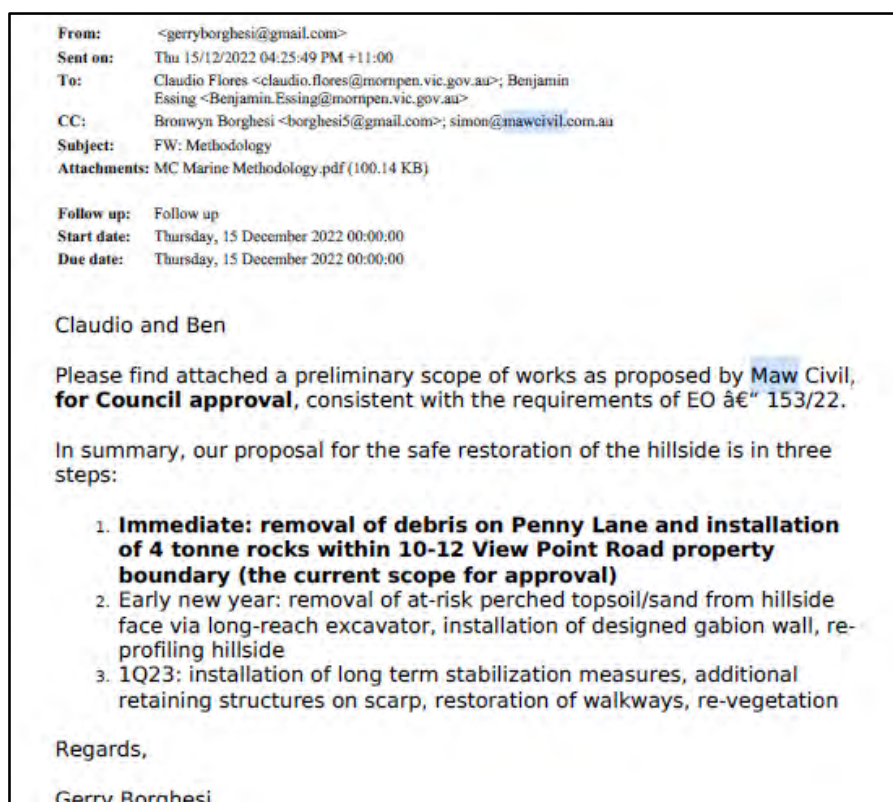


Figure 6.4: Shear failure of the slope with pile support, snapshot from SLIDE

In accordance with Appendix D of AS2870–2011, the soil profile and site conditions should be inspected at footing excavation stage by CIVILTEST PTY LTD to confirm the soil profile and site classification.

Inset 10: Excerpt from the CivilTest Report 1222044-3

26. RW drawings have been supplied for 10-12 View Point Road and for the proposed remediation of the 2022 Landslide (ref. Rexicon Drawings Proposed Land Satbility Design, dated 16 June 2023). I note that:
 - (a) These drawings have seven sheets and they have a very similar reference number as the RW drawings associated with the 2025 Landslide (i.e. the drawing numbers are 23031 S00 to S06).
 - (b) The Rexicon drawings reference the geotechnical report by CivilTest (Ref. 1222044-3 Issue 3 (01/06/2023)).
 - (c) The footing notes state "All footings to be founded 5000 min. into natural clayey sand with a minimum bearing capacity of 250kPa".
 - (d) RW "RW3" was proposed to be constructed immediately down slope of the existing stairs above the 2022 Landslide. The detail for RW3 includes:
 - i. A backslope of 30 to 38°.
 - ii. Post size of 250 UB37.3.
 - iii. Post spacing of 1500 mm.
 - iv. Pier Depth 6000 mm.
27. Email correspondence from the Borghesi's on 15 December 2022 includes correspondence from MAW Civil (refer to my Brief for the 2022 PSM Causation report). I note that MAW Civil are copied into correspondence which outlines the proposed methodology from the Borghesi's to rectify the 2022 Landslide, Inset 11.



Inset 11: Excerpt from my Brief for the 2022 PSM Causation Report (pdf page 75)

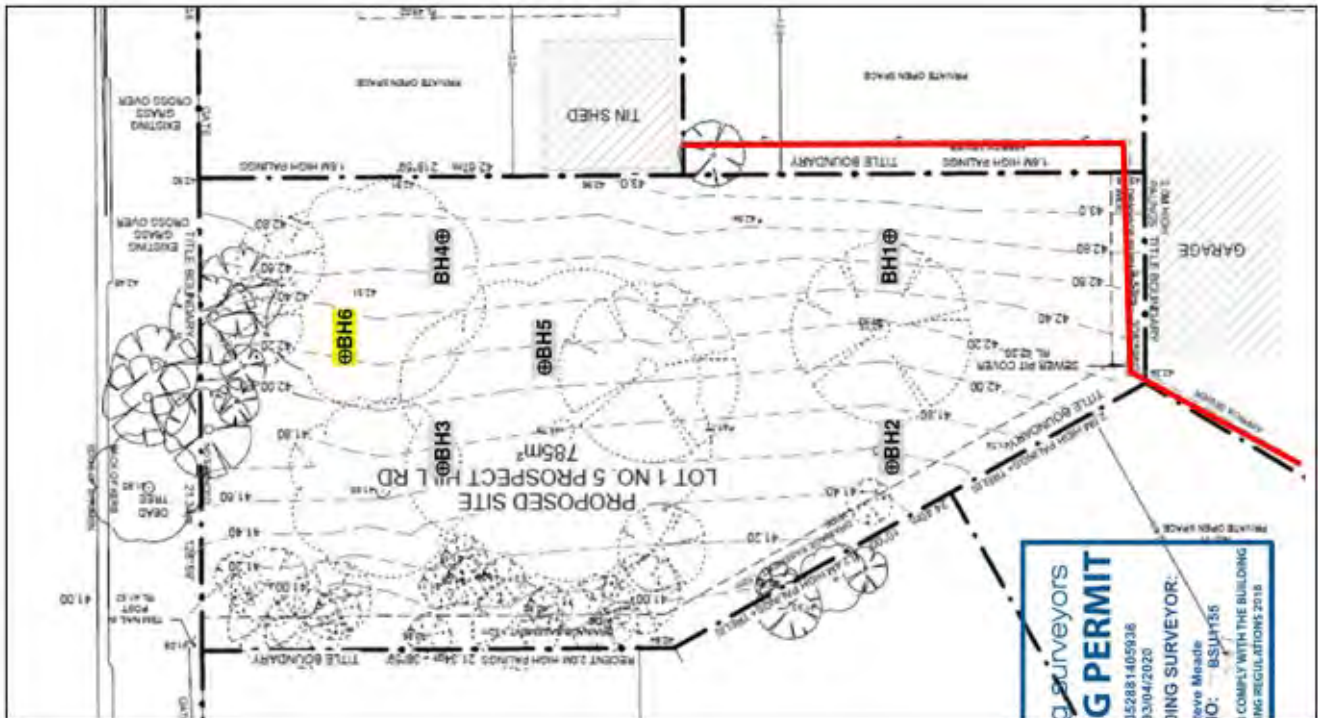
28. I note photographic evidence of contractors working on a RW immediately in front of the 2022 RW, Inset 12. I refer to this RW as “**the 2024 RW**” herein. I provide justification for the timing of construction in C21 and C22 of Appendix C. I have assumed that this contractor is MAW Civil.
29. I note that MAW Civil provided a quotation for RWs that I assume was for the remediation of 2022 Landslides (ref. Quote Retaining Wall 10-12 View Point Road, 2/9/2024). In that quote the proposed RWs included 150UC23 posts @ 1.8 m centres, 1.5 m deep, 1.0 m max upstand. I note that “upstand” is the equivalent of retained height.



Inset 12: Photographs of construction of the 2024 RW (produced by MPSC) with my mark ups in red.

30. I have relied on the accuracy of the borehole logs and surface water observations from the soil test reports conducted at 5 and 7 Prospect Hill Road, Table 5.
31. I note that on 5 Prospect Hill Road there are some inconsistencies in logging of plasticity of the soils however this does not have a significant impact on my consideration of the data within the logs. The investigation was completed on 8 March 2019. With regards to the Hardrock Geotechnical report I note that in borehole 6,
Inset 13:

- (a) "Rapid groundwater ingress was encountered below 3 m during the investigation. A groundwater monitoring well was installed".
- (b) Between 0.5 to 2.20 m depth a dark grey/grey/dark brown "silty/sandy CLAY" was observed.
- (c) Between 2.20 to 4.50 m depth Clayey SAND and SAND was observed with trace gravel at depth. The lower portion of these soils were logged as wet.
- (d) From 4.5 m a silty and sandy CLAY of low or medium plasticity dark grey, grey and orange, moist and very stiff.



Inset 13: Excerpt from Hardrock report for 5 Prospect Hill Road with the location of BH6 highlighted by the author of that report. I have highlighted the sewer location in red.

- 32. With regards to the Hardcore Geotech report for 7 Prospect Hill Road I note that:
 - (a) The investigation was completed on 3 March 2021.
 - (b) Abnormal moisture conditions were observed by the author of that report, Inset 14.
 - (c) Borehole 2 had "very moist" soils at surface, Inset 15.
 - (d) Site photographs show water at surface, below the sub-floor of the dwelling and an iron stained discharge, Inset 16 and Inset 17.

7. Soil Moisture Conditions

At the time of the investigation a perched water table / groundwater was encountered at Borehole 2. Surface groundwater was observed at the front north east section of the yard and under the dwelling subfloor. See site photos. It is likely that there is poor site drainage or a leaking service in this area that needs to be investigated further. If construction is to occur during wet months of the year then temporary

Inset 14: Excerpt from Section 7 of the Hardcore Geotech report for 7 Prospect Hill Road (pdf page 7 of 13)



Inset 15: Excerpt from Site Plan of the Hardcore Geotech report for 7 Prospect Hill Road (pdf page 9 of 13)



Inset 16: Excerpt from site photos of the Hardcore Geotech report for 7 Prospect Hill Road (pdf page 10 of 13)



Inset 17: Excerpt from site photos of the Hardcore Geotech report for 7 Prospect Hill Road (pdf page 12 of 13)

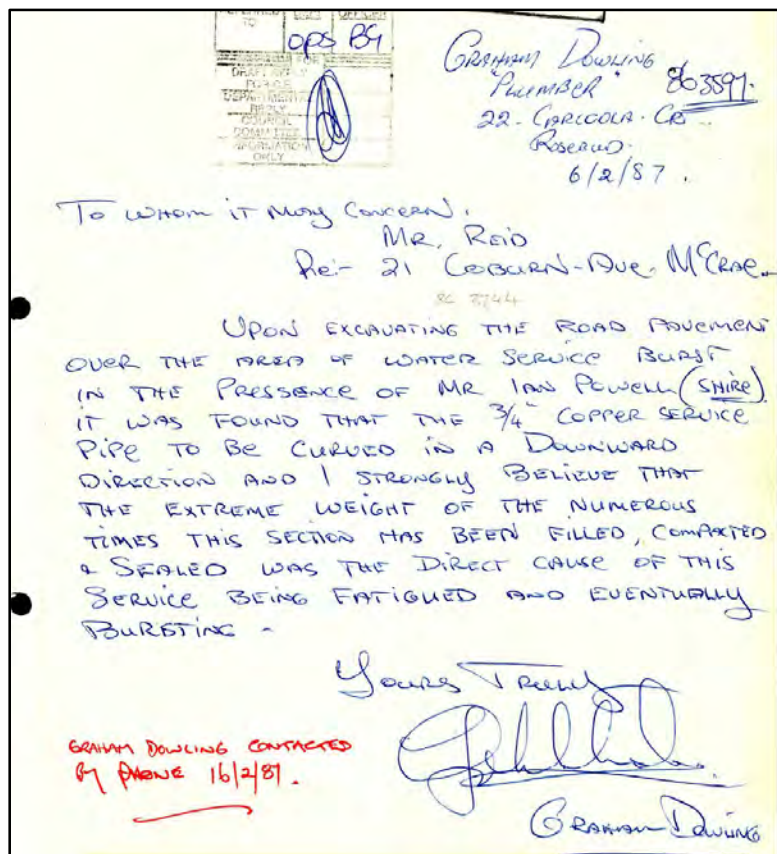
33. I have relied on the accuracy of the borehole logs from the Cardno LanePiper geotechnical investigation at 23 Prospect Hill Road. Table 5. I note that:
- (a) The investigation was conducted on 29 June 2010 and later on 2 March 2012.
 - (b) The subsurface profile was summarised in Table 5-1 of the report, Inset 18.
 - (c) "Groundwater was not encountered in any of the boreholes".
 - (d) Very moist and wet soils were logged at:
 - i. 4.5 m in borehole BH2.
 - ii. 3.0 m in borehole BH4.
 - iii. 3.5 m in borehole BH5.
 - (e) Significant CLAY dominant fill of high plasticity is present up to 8.7 m below the surface level at the time of the investigation.
 - (f) In areas of no to limited filling (e.g. boreholes BH01 and BH03) there are Clayey or Sandy SILT and Silty SAND soils near surface. The Silty SAND in boreholes BH01 and BH03 is "slightly gravelly" or "with gravels" at 1.4 m and 1.6 m respectively.

Table 5-1: Typical Subsurface Profile

| |
|---|
| Rootmatter |
| Overlying |
| FILL. Sandy SILT (ML) / Clayey SILT (ML) low plasticity, moderate fissuring, dark brown, dark grey, firm to stiff, moist, encountered to a depth of 0.2m (not encountered in BH1 and BH6) |
| Overlying |
| FILL. Silty CLAY (CH) / Sandy CLAY (CH) high plasticity, highly fissured, dark brown, grey, very stiff to hard, slightly moist to moist, encountered to a depth of between 1.2m and the maximum borehole depth of between 5.8m and 8.7m (not encountered in BH1) |
| Overlying |
| Sandy SILT (ML) / Clayey SILT (ML) low plasticity, moderate fissuring, light grey, dark grey, firm to hard, slightly moist to moist, encountered to a depth of 0.4m to 1.2m (only encountered in BH1 and BH3) |
| Overlying |
| Silty SAND (SM) fine to medium grained, light brown, orange, dense, slightly moist, with clay and gravels, encountered to the maximum borehole depth of 8.9m to 4.2m (not encountered in BH2, BH4 and BH6) |

Inset 18: Excerpt from Table 5-1 of the Cardno LanePiper report for 23 Coburn Avenue

34. I have relied on the accuracy of the Council Engineer letter and correspondence from a plumber in 21-23 Coburn Avenue subdivision file and related correspondence, Table 5. I note that:
- (a) An “unstable gully” is referenced in the letter. I refer to this as the **“Margaret Street Drain”** herein.
 - (b) Proposals to pipe the gully and partially fill it are discussed. (pdf page 24 of the planning file).
 - (c) “The gully is apparently eroding into the block very rapidly” (pdf page 27 of the planning file).
 - (d) There is evidence of ongoing settlement at the corner of Prospect Hill Road and Coburn Avenue in 1987, Inset 19.
 - (e) 21 Coburn Avenue was subdivided into several properties, one of which is the current 23 Coburn Avenue.



Inset 19: Excerpt from the Planning File for 21 Coburn Avenue (pdf page 10 of the 21 Coburn Avenue Planning File)

35. I have considered a series of CivilTest Landslide Risk Assessments for recent developments along the escarpment, Table 5. I rely on the accuracy of the date of original reporting.
36. CivilTest report RM0997-98 (15 June 1998) is a soil test report for 3 Penny Lane McCrae. I note that:
- (a) The borehole log reports are dated 10 June 1998 and indicate that up to 0.85 m of sand fill is present.
 - (b) The Site is Classified as “CLASS P with respect to foundation construction” and references AS2870 (1996).
37. CE Lawrence & Associates report 02/0555 (30 April 2002) is a soil test report for 6 View Point Road McCrae. I note that:
- (a) The escarpment is shown on the site plan.
 - (b) The borehole log reports are undated and indicate that up to 0.2 m of sand fill is present at the time of the investigation.
 - (c) Section 2.5 states “After considering the area geology, soil profile, the results of hand classification tests, the building superstructure and AS2870 the site has been classified as CLASS M”.
 - (d) Advice is provided specific to development near the escarpment, Inset 20.

FOOTING RECOMMENDATIONS (near escarpment)

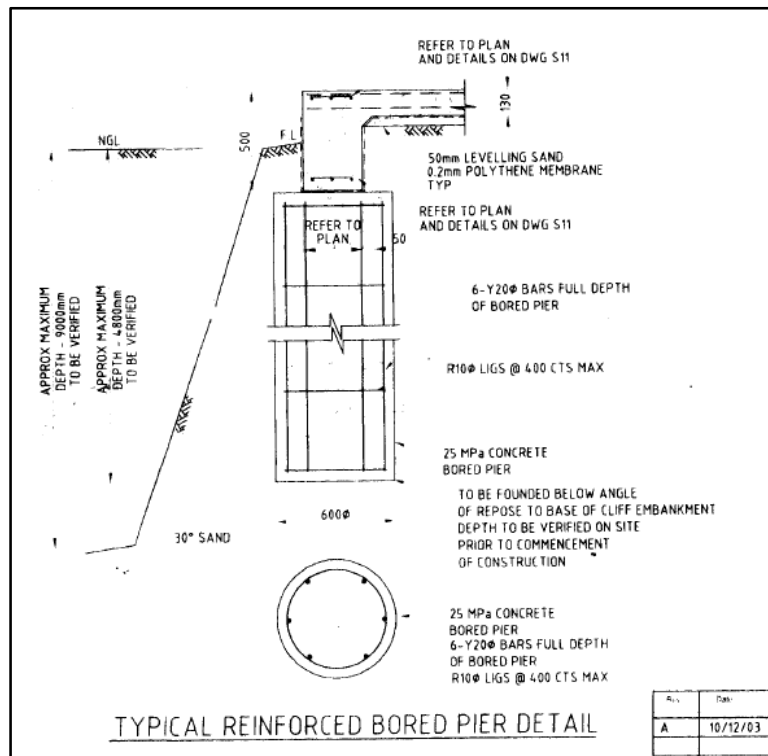
4.1 Footing Systems

The use of deep bored piers founded well below a forty five degree angle taken from the base of the escarpment is recommended. Based on the observed condition of the sandy soils, an allowable bearing pressure of at least 400 kPa will exist beneath these piers. The piers must be used beneath either of the above footing systems in the vicinity of the escarpment. Their exact locations and depth will be determined once final house plans are completed.

In order to minimise the risk of further erosion of the escarpment face it is recommended that minimal excavation works and/or tree/scrub removal takes place. In fact it is recommended that further planting of deep rooted fast growing scrubs/trees be undertaken to help with stabilisation. Also care must be exercised with the design of the stormwater system. It is recommended that all stormwater be outlet to the street below by the use of sealed pipe work.

Inset 20: Excerpt from: CE Lawrence & Associates report 02/0555 (30 April 2002)

38. E-struct structural engineering drawings for 6 View Point Road, Table 5, indicate to me allowances had been made for an "angle of repose" in the order of 30° as measured from approximately 9 m down-slope below the escarpment and which bored piles were to be "founded below angle of repose to base of cliff embankment", Inset 21.



Inset 21: Excerpt from E-struct drawings of bored piles for 6 View Point Road

Table 5 – MPSC planning documents

| File | Address | References | PDF page reference |
|--|-----------------------|---|--------------------|
| C1302_04 - 6 Point View Road McCrae | 6 View Point Road | Site/Context Plan (includes levels pre-development) | 28 |
| C1302_04 - 6 Point View Road McCrae - BUILDING PERMIT INCLUDES GEOTECHNICAL REPORT | | Structural drawings Soil Test Report | All |
| P15_0321 - 10-12 Point View Road - vegetation removal | 10-12 View Point Road | G.J. Martin Feature Survey of CP 109563 27/05/2014 | 1 |
| P15_1503.01 - 10-12 View Point Road McCrae - dwelling additions | 10-12 View Point Road | JDA Architects Proposed Site Plan & Tree Removal Plan | 4 |
| C2715_12 - 3 Penny Lane McCrae - Soil Report_stamped | 3 Penny Lane | CivilTest Soil Test Report (1998) | All |
| 148726 - 3 Penny Lane~MCCRAE VIC 3938 ____ Scanned Property File ____ (A13522532) | 3 Penny Lane | Site context photos from 1996 | 249 |
| Soil Report – 5 Prospect Hill Road McCrae | 5 Prospect Hill Road | Hardrock Geotechnical 181317/1 20 March 2019 | 1-5 |
| Soil Report – 7 Prospect Hill Road McCrae | 7 Prospect Hill Road | Hardcore Geotech 210307 3/03/2021 | 1-13 |
| Soil Report | 23 Coburn Avenue | Cardno LanePiper 210155Report01.1 23 March 2012 | 1-17 |
| 111409-21 Coburn Avenue MCCRAE VIC 3938 Scanned Property File | 21 Coburn avenue | Flinders Shire Letter HT:DK PS.2153 6 July 1977 | 24 |
| land stability assessment report 1140220e rev_1 | 14-16 View Point Road | CivilTest 1140220E 19 May 2014 original issue | 1-47 |
| P18_0533 - GeoTech Report endorsed | 597 Point Nepean Road | CivilTest 1180525-2 2 November 2018 | 1-35 |
| 565 Point Nepean Road - Full Current set of Endorsed Planning Permit Plans associated with dwelling, includes Geotech Report (A13577199) | 565 Point Nepean Road | CivilTest 1160975-4A 25 November 2016 original issue | 15-58 |

3.5 SEW Factual Data

39. I have relied on the accuracy of the SEW GIS data to inform the general location of key assets and which includes water mains and sewers and the depths to the invert of sewers and date of construction. Further information on the SEW GIS data is provided in Section 5.3 of the PSM LRA. Asset locations are shown on Figure 3.
40. I have relied on the accuracy of SEW field reporting on various water main failures and repair events in the McCrae region. These reports are included in various Freedom of Information (**FOI**) requests from MPSC to SEW between May and July 2025. I note that:
 - (a) At some point between 31 December 2024 and 1 January 2025 the near surface soils in Waller Place and Charlesworth Street were saturated and with flow/exfiltration observed in several places, Inset 22 and Inset 23 respectively.
41. With regards to sewer lines in the vicinity of the 2025 Landslides I have marked up select depths on Figure 3. With regards to services underneath the MPF I note that:
 - (a) Both the sewer and water mains services traverse the Freeway, Figure 3.
 - (b) The water main was constructed at a similar time to the Freeway in 1972 and I assume that it was trenched.
 - (c) The sewer was built in 1980 and may have been bored or trenched.
42. I have relied on water usage data of properties in the McCrae area between November 2021 and June 2025. This data was provided by SEW (refer to SEW.001.001.5172) pursuant to a notice to produce.
43. In March 2019 a SEW Program Engineer was interviewed by the Australian Water Association on risks associated with ageing Asbestos Cement (**AC**) water pipelines, Inset 24. That interview indicates to me that:
 - (a) Most of SEWs AC pipes were laid in the 1950s and 1960s.
 - (b) They have an average life span of 60 to 80 years.
 - (c) "Peak failures" are expected in the near future.



Inset 22: 1 Waller Place looking south west (pdf page 175 of MPSC SEW FOI request May 2025)



Inset 23: 3 Charlesworth Street looking north west (pdf page 177 of MPSC SEW FOI request May 2025)

Here's how one utility is dealing with ageing asbestos in water mains

Mar 25, 2019 | 3 mins read

by **Ruth Cooper**

As the 40,000 km of asbestos cement (AC) water pipes across Australia continue to deteriorate in the coming decades, water utilities must find safe ways to rehabilitate their assets.

While there is no evidence to suggest asbestos in pipes is a danger to drinking water, utilities need to mitigate the risks that come from replacing or upgrading the infrastructure.

The issue is most significant in Victoria, which is [home to 70% of the country's AC pipes](#). The situation was made more complex in 2015, when the state banned the common practice of AC pipe bursting – where a head is taken through the pipe to crack it open – because the process leaves behind asbestos fibres in the soil.

Since then, the Victorian water industry has been searching for solutions. This includes South East Water, which is dealing with 1600 km of AC pipes, or about 20% of its total water network.

Most of South East Water's AC pipes were laid in the 1950s and 60s. Their average lifespan of 60 to 80 years means there will be a "peak of failures" in the near future, said South East Water Program Engineer Nick Stetter.

Inset 24: Excerpt from Australian Water Association interview with SEW Program Engineer

3.6 Board of Inquiry into McCrae Landslide Witness Statements

44. I have considered the following estimates by others regarding water losses due to the burst water main:
- (a) Managing Director of SEW Lara Ohlsen (SEW.0001.0001.0110), Inset 25.
 - (b) McCrae Resident and licenced plumber John Bolch (RES.0003.0002.0032), Inset 26. I have underlined total estimated water losses in red.

64. SEW estimates approximately 37 megalitres of water escaped from the Burst Water Main between November 2024 until its isolation on 31 December 2024.

Inset 25: Extract from witness statement of Lara Ohlsen

73.2 water was flowing through the water main at a rate of 16.79 litres a second at 590 kPa from a fully open 25 mm orifice. This equates to a flow rate of just over 1,000 litres per minute, which further equates to 60,000 litres per hour and 1,440,000 litres per day.

74. Using that data, I have calculated the potential leak volume for two different periods as follows:

74.1 **38 days of leakage**, on the assumption that the leak persisted between 24 November 2024 and 31 December 2024 (I explain these dates below) — a leak over this period would have released 54,720,000 litres of water (1,440,000 x 38 days). To contextualise this figure, an Olympic-sized swimming pool holds approximately 2.5 million litres of water. Therefore, 54,720,000 litres of water is equivalent to about the volume of water held in 22 Olympic-sized swimming pools.

I have used these dates based on information that Kevin has told me. Namely, that: (i) on 24 November 2024, a resident reported water leaking through the road on Charlesworth Street; and (ii) on 31 December 2024, SEW attended the Burst Site to conduct repairs.

74.2 **60 days of leakage**, on the assumption that the leak commenced about 3 weeks prior to 24 November 2024 — a leak over this period would have released 84,400,000 litres of water (1,440,000 x 60 days), which is equivalent to about 34 Olympic-sized swimming pools' worth of water.

85. On 23 April 2025, I received an email from Mr Christofi, enclosing a computation of simulated flow rates to estimate the water flow from the Affected Pipe (**Christofi Report**). The Christofi Report suggests that 81,776,000 litres of water could have leaked from the Affected Pipe over a **60-day period** (about 33 Olympic-sized swimming pools).

Inset 26: Extract from witness statement of John Bolch. My annotations in red.

3.7 Survey Data

45. I have relied on the accuracy of the Diospatial surveys completed in January and February 2025. Further information on the accuracy of the surveys is provided in Section 2.5 of the PSM LRA. I have used the photogrammetry based Pointerra Reality Model to measure key elements such as RWs, planter boxes, thickness of lithological units and seepage points in the 2025 Landslide.

3.8 Rainfall Data

46. I have used the rainfall data from the following weather stations:
- (a) Rosebud (Station ID 86213).
 - (b) Mornington (Station ID 86079).
 - (c) Arthurs Seat (Station ID 586202).
47. Further information on the rainfall data and other weather stations used is provided in Sections 1.3.3 and 5.1 of the PSM LRA.

4. Chronology

48. I have developed a chronology of events in Table 6. I have provided excerpts of factual information in Appendix C. I have relied on the accuracy of these supporting facts. Where I have made an interpretation based on factual data I have provided the basis for the interpretation. For example, inferred Site characteristics interpreted from aerial photographs.

Table 6 – Chronology of events

| Date | Event | Supporting facts | Slide of Appendix C |
|-------------|--|--|---------------------|
| 1913 | Subdivision and sale of lots associated with the Coburn estate commences. | MPSC Heritage Review, Area 2 Vol. 2 - Place and Precinct Citations (09/2017) | 1 |
| 1939 | 3 Penny Lane and 10-12 View Point Road dwellings observed | Aerial Photo 1939 | 2 |
| 1930-1950 | Photo of 10-12 View Point from approximately rear of 599 Point Nepean Road | Photographs compared to Diospatial terrain model | 3 |
| 1955 | 6 View Point Road is inferred to be well vegetated | Aerial Photo 1955 | 4 |
| 1957 | 10 ft survey of McCrae | Department of Crown Lands and Survey Plan | 5 |
| 1958 | AC Water main constructed on View Point Road | SEW GIS, Section 0 | - |
| 1970 | 6 View Point Road: changes to vegetation on the escarpment | Aerial Photo 1970 | 6 |
| 1972-1973 | MPF under construction (1973 complete) | Aerial Photo 1972 | 7 |
| 13/8/1975 | Documentation of “ <i>Reln</i> ” septic trenches for 10-12 View Point Road | MPSC Scanned Property File (116768 - A12663035) | 8 |
| 1977 - 1979 | Evidence of significant disturbance to vegetation on slopes from 6 View Point Road, 10-12 View Point Road and 3 Penny Lane Margaret Street gully obvious and not filled | Aerial Photo 1977 | 9 |
| 22/02/1979 | Plans sealed regarding subdivision of 6 View Point Road and 10-12 View Point Road | MPSC Scanned Property File (116768 - A12663035) | 11 |
| 1979 | Evidence of re-vegetation on slopes from 6 View Point Road, 10-12 View Point Road and 3 Penny Lane | Aerial Photo 1979 | 10 |
| 1979/1982 | Margaret Street gully inferred filling commences | Shire of Flinders Margaret Street Drain 1980 | 12 |
| | | Aerial Photo 1979/1982 | 13 |
| 1981 | Sewer constructed on View Point Road | SEW GIS, Section 0 | |
| 16/9/1987 | Complaint of water running onto property at 607 Point Nepean. Investigated and noted by others to be “ <i>most likely borne from soil, rock minerals leachate. Effluent?</i> ” and 10-12 View Point “ <i>connected to the sewer has been made dated 30/3/83</i> ”. | MPSC Scanned Property File (116768 - A12663035) | 14 |
| June 1996 | Photo of gully from Point Nepean Road. Gully and crest of slope on 10-12 View Point Road is well vegetated | MPSC Scanned Property file (148726 - (A13522532)) | 15 |

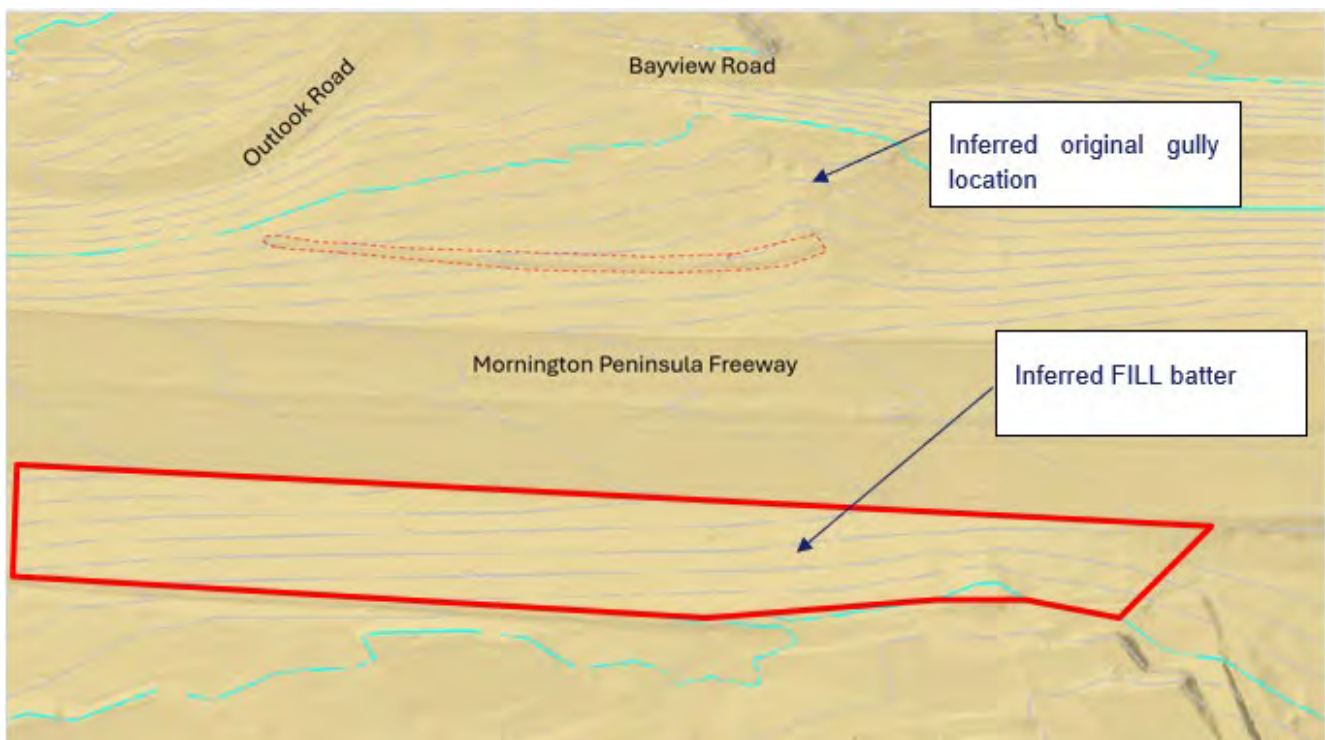
| Date | Event | Supporting facts | Slide of Appendix C |
|------------------|--|--|---------------------|
| 2003 | Grassed area at northern extent of plateau slopes on 6 View Point Road | MPSC GIS Aerial Photo | 16 |
| 5/03/2003 | 6 View Point Road Site Context drawing indicates trees are already in place north of locations that are known to have been filled | Mike Salpietro Drafting | 17 |
| 03/03/2004 | 6 View Point Road -Sewer plan updated. Trench along boundary between 6 and 10-12 View Point Road | SEW PSP Drawing | 18 |
| 2005 | 6 View Point Road slab on ground observed. Inferred large trees shadowing the western side of slab. | MPSC GIS aerial photo | 19 |
| 27/05/2014 | 10-12 View Point Road feature survey with existing trees and surface contours. Cowitch Tree, SW Pittosporium and inferred edge of cliff presented. Select levels near escarpment between 6 and 10-12 View Point Road | G.J. Martin Feature Survey (MPSC ref. P15_0321 - 10-12 Point View Road - vegetation removal) | 20 |
| 04 to 11 2021 | Trees removed from adjacent to 2022 RW location on 10-12 View Point Road | Nearmap imagery (2D and 3D) | 21-25 |
| 7/12/2022 | Collapse settlement repaired in sewer trench in front of 6 View Point Road pedestrian gate | pp. 28 and 39 of SEW FOI request (6 June 2025) | 26 |
| 12/05/2023 | Evidence of seepage points in drone photography | 6 View Point Road Owner supplied DJI_0143-7.jpeg | 27 |
| 23/11/2023 | PSM inspection by AW 2022 RW condition | | 28 |
| 31/12/2024 | SEW repair Outlook Road water main | pp. 136 to 138 of SEW FOI request (13 May 2025) | 29 |
| 5/01/2025 | 2025 Landslide initial failure | - | - |
| 6/01/2025 | Flow measurement of no less than 0.15 to 0.2 Litres per second from 2025 Landslide | DRP direct measurement | - |
| 14/01/2025 | 2025 Landslide second failure | - | - |
| 18/03/2025 | MPSC repairs Coburn Avenue/Charlesworth Street intersection Inflow of groundwater into CBR1 test location. | Inset 3 and Section 6.1 of PSM5665-070R | - |
| 31/03/2025 | SEW re-lines sewer in front of 6 View Point Road | pp. 127 of SEW FOI request (6 June 2025) | 30 |
| 04/2025 | Private water main repaired on 5 Prospect Hill Road | Section 7.6.3.4.4 of SMEC "McCrae Landslip Project" (pp. 74 of SMEC 001 Rev0 5 May 2025) | |
| 6 and 13/05/2025 | MPSC repairs Browne Street stormwater | Section 5.3 | - |
| 16/06/2025 | Flow measurement of no less than 50 Litres per day from 2025 Landslide | DRP direct measurement | - |

5. PSM Geotechnical Investigation

5.1 Inspections

49. I completed a series of inspections between 6 January 2025 and 16 June 2025, Table 3. The scope of the inspections was to gather facts relating to the PSM LRA and for investigations into cause of the 2025 Landslides. Select walking tracks are included in Figure 4.
50. In early 2025 a series of inspections were completed to investigate surface water and groundwater. A summary of my observations related to surface water and groundwater are included on Figure 5. Supporting photographs are included in Appendix D. A summary of my key observations is as follows:
- (a) Saturated soils and flowing water were observed in the headscarp of the 5 January 2025 landslide on 6 January 2025, Photo 1 of Appendix D. Further details are provided in Section 6.3.2.7 of the PSM LRA. I inspected the stormwater system on View Point Road at that time, Photo 2 of Appendix D, and no evidence of significant losses were visually observed along the line from 2 View Point Road to 22 View Point Road. I identified issues at the outlet at the end of View Point Road and this was communicated to MPSC at that time, Figure 5.
 - (b) Significant zones of saturated soils were observed throughout the community on 15 January 2025 (Photos 3 to 7 of Appendix D). Most of the property owners I spoke with at that time indicated that this was the wettest that they had observed their properties (34 Coburn Avenue and 1 Prospect Hill Road). I noted with the owner of 1 Prospect Hill Road that they had evidence of rising damp under their house, Photo 8, and that it may not be a unique event where surface water enters beneath the dwelling. Refer to Table 4 for interview details.
 - (c) I observed groundwater in sewer trench backfill on Charlesworth Street on two occasions 16/01/2025 (Photos 9 to 10 of Appendix D) and 24 January 2025 (Photos 12A to 12C of Appendix D). Furthermore, on the 24 January 2025 I noted in the test pit excavated by SEW:
 - i. The surficial Clayey SAND observed in the test pit was moist and became saturated at approximately 2.4 m below surface level (Photo 12A, 12B of Appendix D).
 - ii. At approximately 2.65 m depth a nominal 20 mm single size gravel aggregate was observed. This gravel was saturated (Photo 12C of Appendix D).
 - iii. Although initially water was inferred to be flowing in the trench backfill, it became apparent that SEW had impacted the sewer pipe and water was draining into the sewer.
 - (d) Seepage points in the 2025 Landslide were observed on the 21 January 2025 (Photos 11A to 11B of Appendix D).
 - (e) On the 24 January 2025 I observed saturated soils near the headscarp of the 2022 Landslide, Photos 13 to 14 of Appendix D (ref. Soil sample locations S1 to S5 of Figure 2 of the PSM GFR and Section 6.3.2.6 of the PSM LRA).
 - (f) On 30 January 2025:
 - i. Seepage points in the 2025 Landslide were observed (Photo 15A and 15B of Appendix D).
 - ii. Wet soils were observed in Waller Place and with evidence of rutting in the shoulder of the road, Photo 16 of Appendix D. I note that this is 30 days following the SEW photos presented in Inset 22.
 - iii. A significant plume of sand dominant sediment was observed downstream of the Outlook Road water main failure, Photo 17 of Appendix D. This represented strong evidence of significant flows in the past. I did not observe the trace of the sediment plume extending beyond the cut off swale drain upstream of the motorway, Inset 27. I noted that this area was notably drier than the slopes around Waller Place/Charlesworth Street at the same time.
 - iv. Upstream of Bayview Road, stormwater flows were observed in an outlet that discharges into the Boulevard gully, Photo 18 of Appendix D.
 - (g) On 12 February 2025 green dye was observed in the 2025 Landslide head shortly after addition of green dye into borehole NDT01, Photos 19 to 21 of Appendix D. Refer to Table 7 for details.
 - (h) On 17 February 2025 the green dye in the 2025 Landslide head was confirmed and the intensity of the colour had increased, Photos 22 and 23, Appendix D.

- (i) On 21 February 2025:
 - i. I observed standing water at surface immediately adjacent to where the Outlook Road Water Main had been repaired, Photo 24 of Appendix D. I could insert my arm into a water filled void up to 0.3 to 0.4 m below surface level.
 - ii. The sediment plume downstream from the Outlook Road water main was between 50 to 100 mm thick in places, Photo 25 of Appendix D.
- (j) Seepage points in the 2025 Landslide were observed on the 28 February 2025 (Photos 26A and 26B of Appendix D).
- (k) Red dye was added to borehole NDT02 on 3 March 2025 (Photo 27 of Appendix D). Only green dye from previous testing of NDT01 was observed on 3 March 2025 (Photo 28 of Appendix D). Refer to Table 7 for further details.
- (l) On 7 March 2025, inferred sediment staining was observed on tree stumps downstream of the Outlook Road water main failure, Photo 29 of Appendix D.
- (m) Seepage points in the 2025 Landslide were observed on the 7 March 2025 (Photo 30 of Appendix D).
- (n) Seepage points in the 2025 Landslide were observed on the 20 March 2025 (Photos 31A and 31B of Appendix D).
- (o) Red dye was added to borehole BH01A on 20 March 2025 (Photo 32 of Appendix D). Refer to Table 7 for further details.
- (p) On 2 April 2025 the invert of Coburn Creek was inspected. Inferred XW Granite was observe at the base of the gully, Photos 33A and 33B of Appendix D.
- (q) Seepage points in the 2025 Landslide were observed on:
 - i. The 10 April 2025 (Photos 34A and 34B of Appendix D).
 - ii. The 20 May 2025 (Photos 35A and 35B of Appendix D).
 - iii. The 16 June 2025 (Photos 36A and 36B of Appendix D).



Inset 27: Swale drain highlighted in red immediately downstream of the Outlook Road Water Main Failure

5.2 Historical Photographs

51. I have considered historical photographs from several sources and which includes:
 - (a) Lotsearch aerial images.
 - (b) Landata aerial images.
 - (c) Nearmap.
 - (d) Google Earth.
 - (e) MPSC GIS software.
 - (f) Property Owners.
52. Select photographs with my interpretation and annotations are included in Appendix C.

5.3 Stormwater Defects

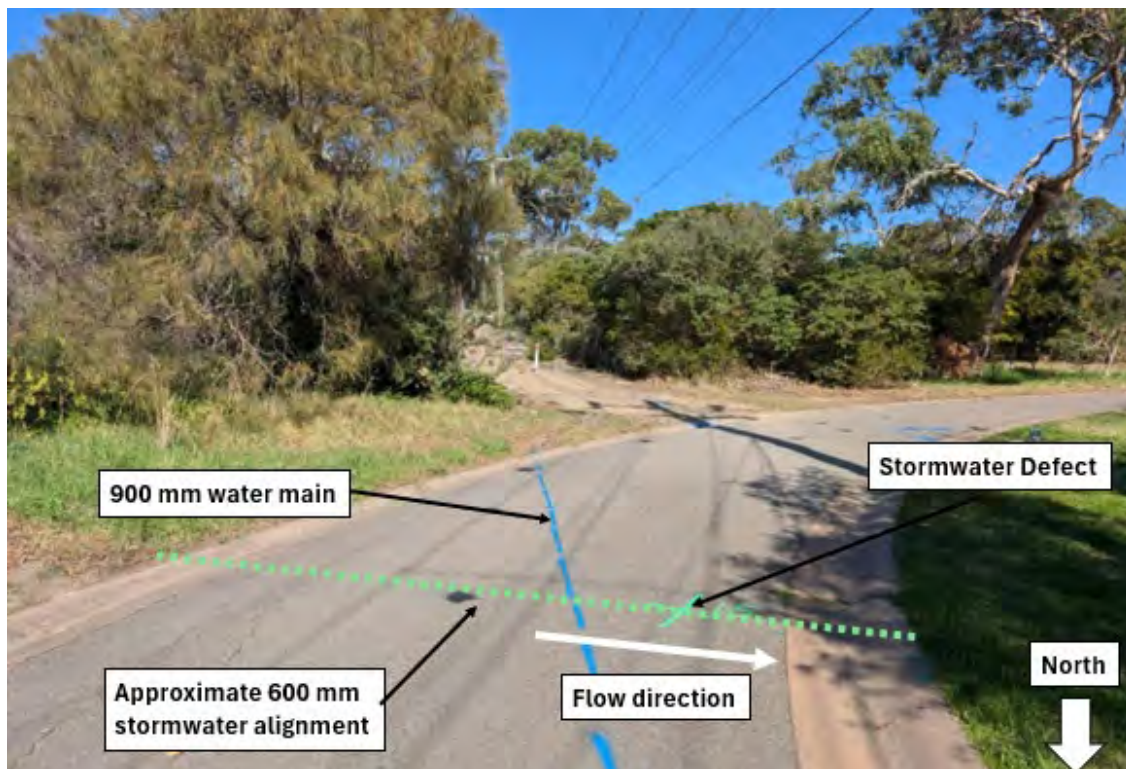
5.3.1 CCTV Inspections

53. I have, with the assistance of my colleague Oliver Stirzaker reviewed the results of available CCTV footage of stormwater assets in the McCrae Area. The CCTV footage and reports were prepared by CSA on behalf of MPSC. The data was provided to me in the form of a digital data viewer containing:
 - (a) Asset inspected.
 - (b) Asset details included material and dimensions.
 - (c) CCTV inspection reports including observations of damage to the stormwater infrastructure, pipe displacements and blockages.
54. Figure 6 presents a plan showing the MPSC stormwater infrastructure where CCTV inspection records were made available to me. Approximately 1690 m of stormwater pipe were inspected.
55. I have assumed that defects in the stormwater system large enough such that soil or a void is visible, are sufficiently large to promote loss of water from the stormwater system beyond what would be expected for a stormwater system comprising butt jointed pipes.
56. I have identified 34 locations where soil or a void is visible through a defect:
 - (a) 7 instances of radial displacements at a pipe joint.
 - (b) 3 instances of longitudinal displacement at a pipe joint.
 - (c) 1 instance of angular displacement at a pipe joint.
 - (d) 9 instances of a localised hole.
 - (e) 14 instances of circumferential cracking.
57. In addition, I understand that inspections undertaken by MPSC indicated that an undocumented stormwater pipe near Outlook Drive is fully blocked approximately 3 metres upstream of Pit 602345 (refer to Defect 35).
58. The locations of the 34 defects noted in Paragraphs 56 and the reported blockage noted in paragraph 57 are presented on Figure 6 and summarised in Appendix E.

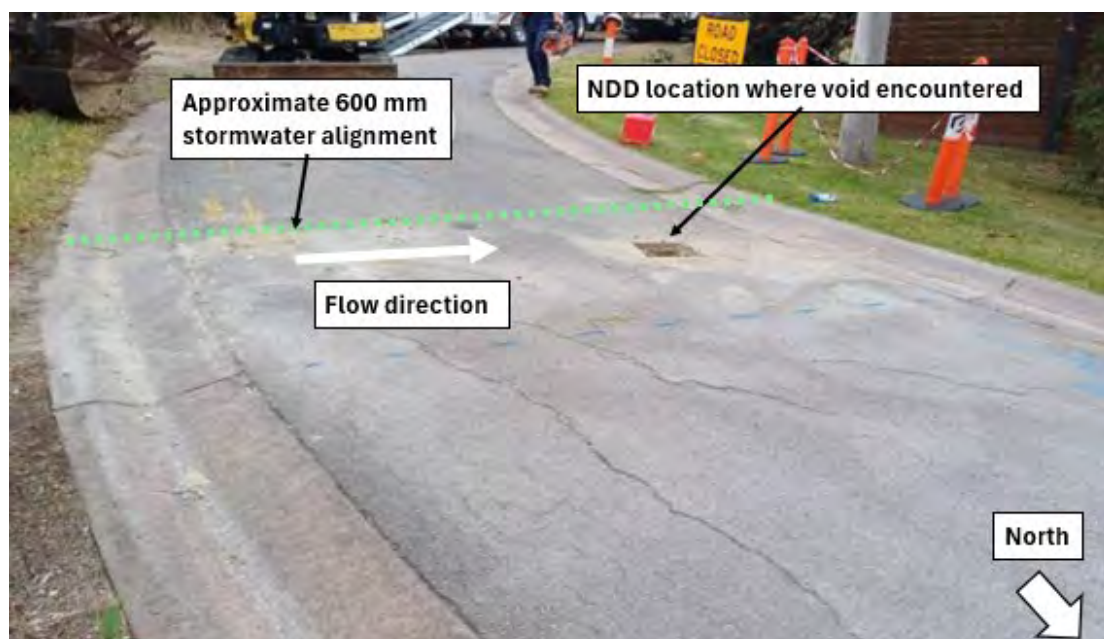
5.3.2 Browne Street Stormwater Repair

5.3.2.1 Background

59. I understand that MPSC identified a defect in a 600 mm diameter stormwater pipe at the intersection of Browne Street and Coburn Avenue that was known to cross over a 900 mm diameter water main (referred to herein as the **"Dromana to Portsea water main"**, Inset 28).
60. I note that the defect described in Paragraph 59 is Defect 1 in Appendix E. This defect is referred to herein as the **"Browne Street Stormwater Defect"**.
61. I understand that on 6 May 2025 MSPC undertook non-destructive drilling (**NDD**) adjacent to the Browne Street Stormwater Defect to positively identify the Dromana to Portsea water main, and that during the NDD works a void (the **"Void"**) was identified beneath the pavement immediately north of the 600 mm stormwater pipe, Inset 29.



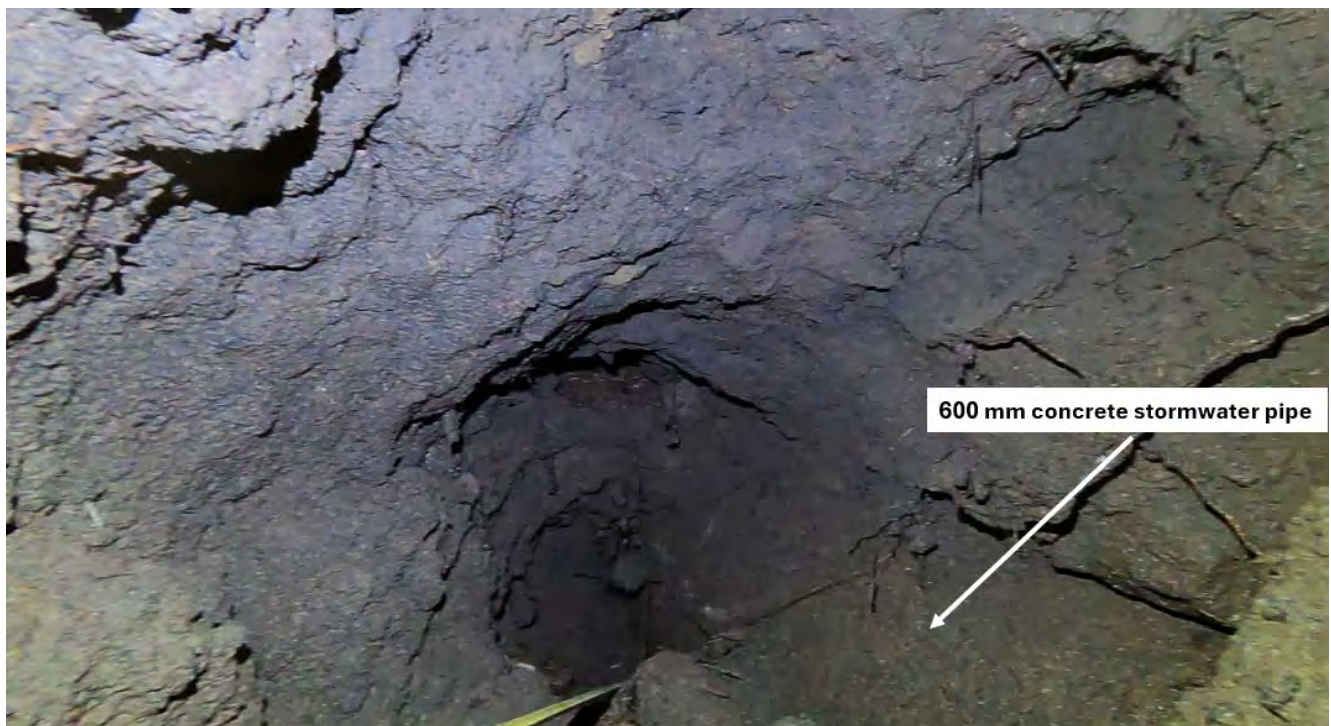
Inset 28: Browne Street stormwater and Dromana to Portsea water main alignment



Inset 29: Browne Street stormwater NDD location

5.3.2.2 PSM Initial Inspection

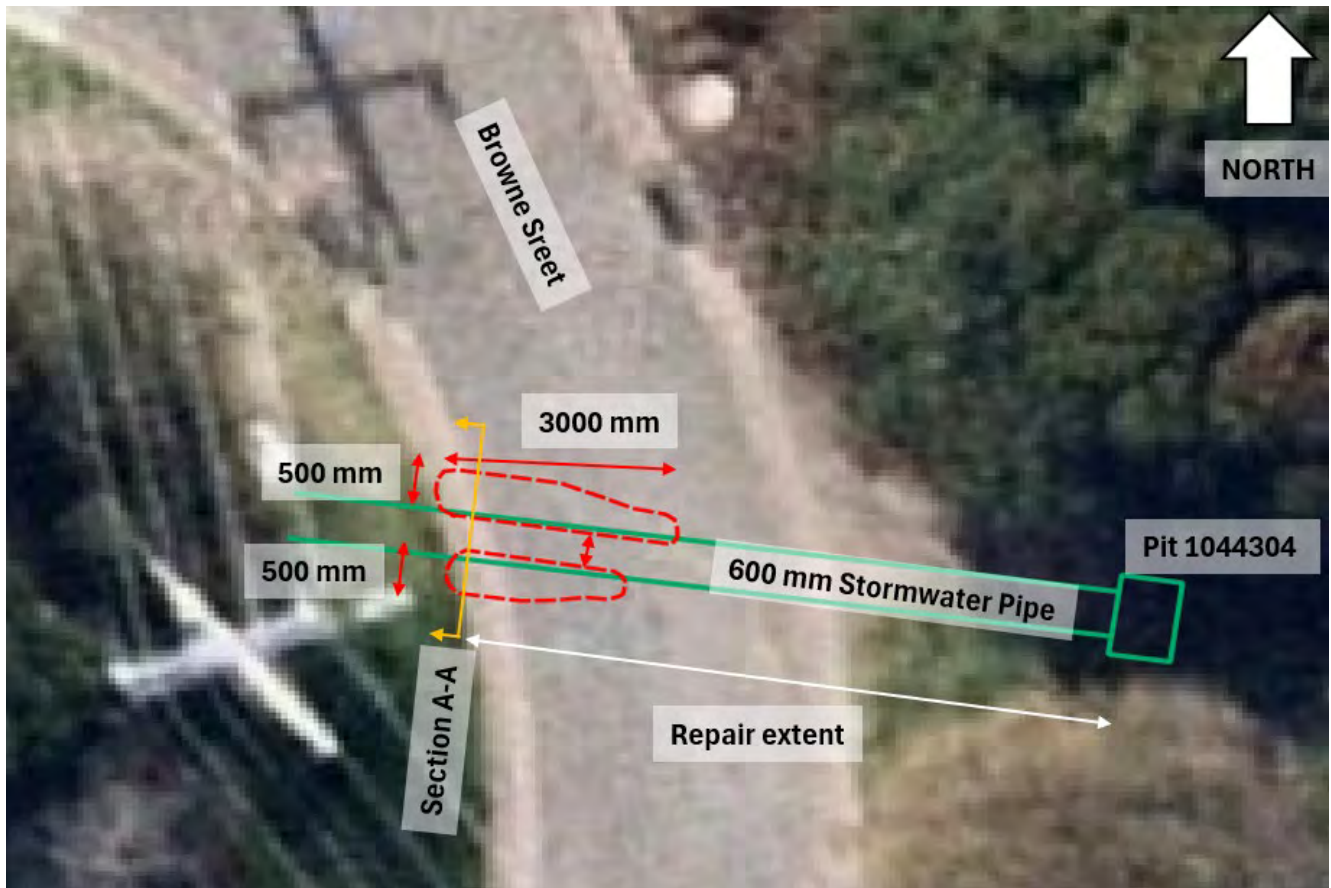
62. My colleague Oliver Stirzaker inspected the Void on the afternoon of the 6 May 2025. I have reviewed his site records and photographs and note:
- (a) The Void depth was difficult to determine due to partial backfill undertaken by the NDD contractor.
 - (b) Approximately 0.4 m cover was present between top of the Void and road surface.
 - (c) The Void was probed to greater than 1.5 m length subparallel to the stormwater pipe in the upstream direction.
 - (d) The concrete stormwater pipe was visible in a down hole video on the southern edge of the Void, Inset 30.



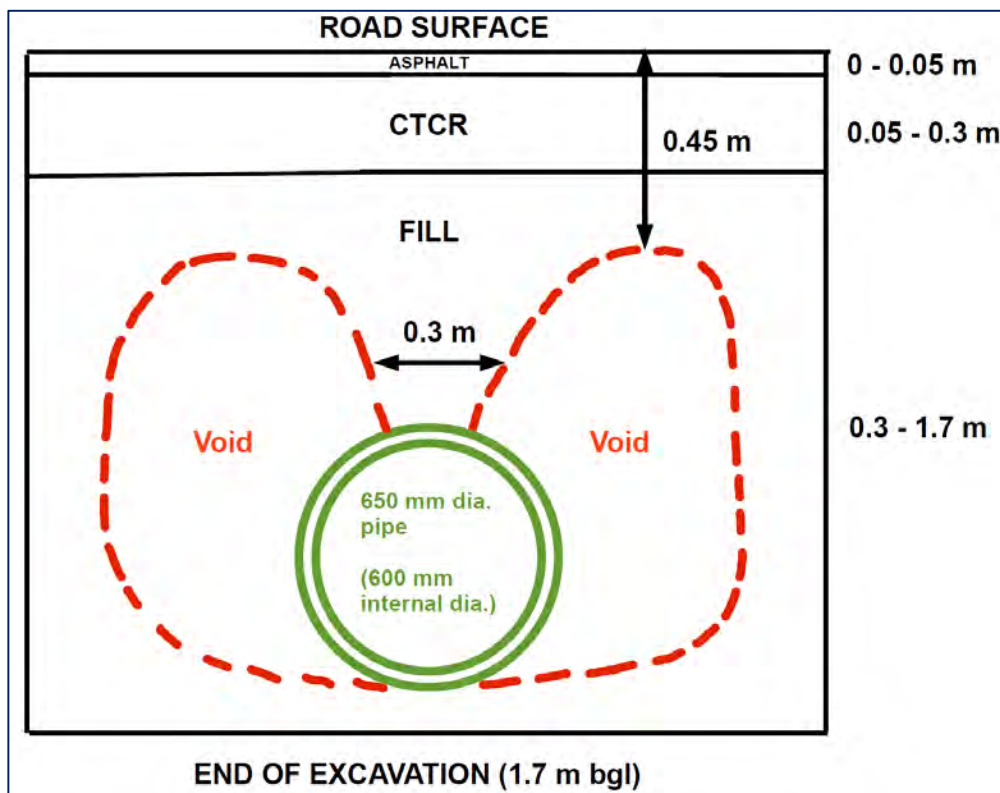
Inset 30: Screen shot of down hole video on the northern edge of the Void

5.3.2.3 Stormwater Repair

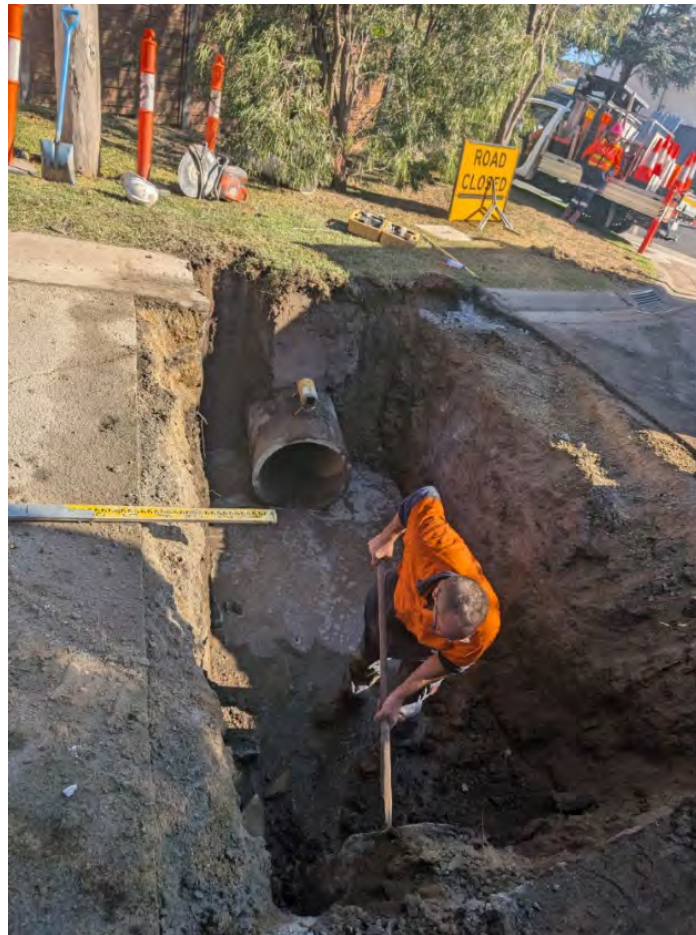
63. I understand that MPSC engaged Fulton Hogan (FH) to undertake a repair of the stormwater pipes associated with the Browne Street Stormwater Defect. I understand that FH was instructed to remove and replace the stormwater pipes between approximately the Browne Street western kerb and the upstream stormwater pit (Pit ID 1044304) for a total of approximately 8 metres of pipe.
64. I have considered the following site inspection records prepared by MPSC for the above works:
 - (a) Email from Garth McKinlay to Aidan Gallagher on 15 May 2025 titled “McCrae Landslip – Browne Street Void and Drainage Repairs”
 - (b) Construction Works Template Under Development for McCrae Landslip, Site Visit 5, 6 and 7.
65. My colleague Oliver Stirzaker attended the site on 13 May 2025 to inspect the repair works and identify the extents of the Void.
66. I have reviewed the photographs and site records of Oliver Stirzaker and MPSC.
67. I have approximately the extents of the void to be approximately 3 m long and up to approximately 0.5 m width either side of the pipe, Inset 31 and Inset 32. The footprint of the void (including below the pipe) is approximately 4 m².
68. I have identified the following defects in the western most pipe segment:
 - (a) The upstream and downstream ends were displaced. Observed displacement was consistent with the relevant CCTV footage at Defect 1 and Defect 4 (Appendix E).
 - (b) Two localised holes.
69. The stormwater pipe was flowing at the time of the inspection. The flow rate was not measured. I note that the 10-day antecedent rainfall at Arthurs Seat (Station ID 586202) was 3 mm, and this 3 mm fell on 8 May 2025. This indicates to me that the observed flow is likely to be representative of base flow conditions.
70. During the repair water from the stormwater pipe was observed to pond against the western end of the excavation and did not show signs of preferential flow at the pipe-soil interface or elsewhere, Inset 33.



Inset 31: Approximate extents of the Void



Inset 32: Section A-A showing approximate Void geometry



Inset 33: Pondered water from stormwater pipe flows

5.4 Intrusive Investigations

71. I have completed a series of intrusive investigations, Table 2. As party of my investigation for my Brief I completed an additional two hand augers on 16 June 2025. I completed Dynamic Cone Penetrometers (DCP) at each hand auger location. The hand auger locations were measured off the 6 View Point Road dwelling with a tape measure and the Pointerra Reality Model was used to interpret the coordinates of each location. Borehole log and DCP log reports are included in Appendix F. The hand auger locations are shown on Figure 1. Disturbed samples were collected to complete the following laboratory tests:
- (a) Nine Particle Size Distributions.
 - (b) Two Atterberg Limits.
 - (c) Nine Moisture Contents.
72. Laboratory test certificates are included in Appendix G.

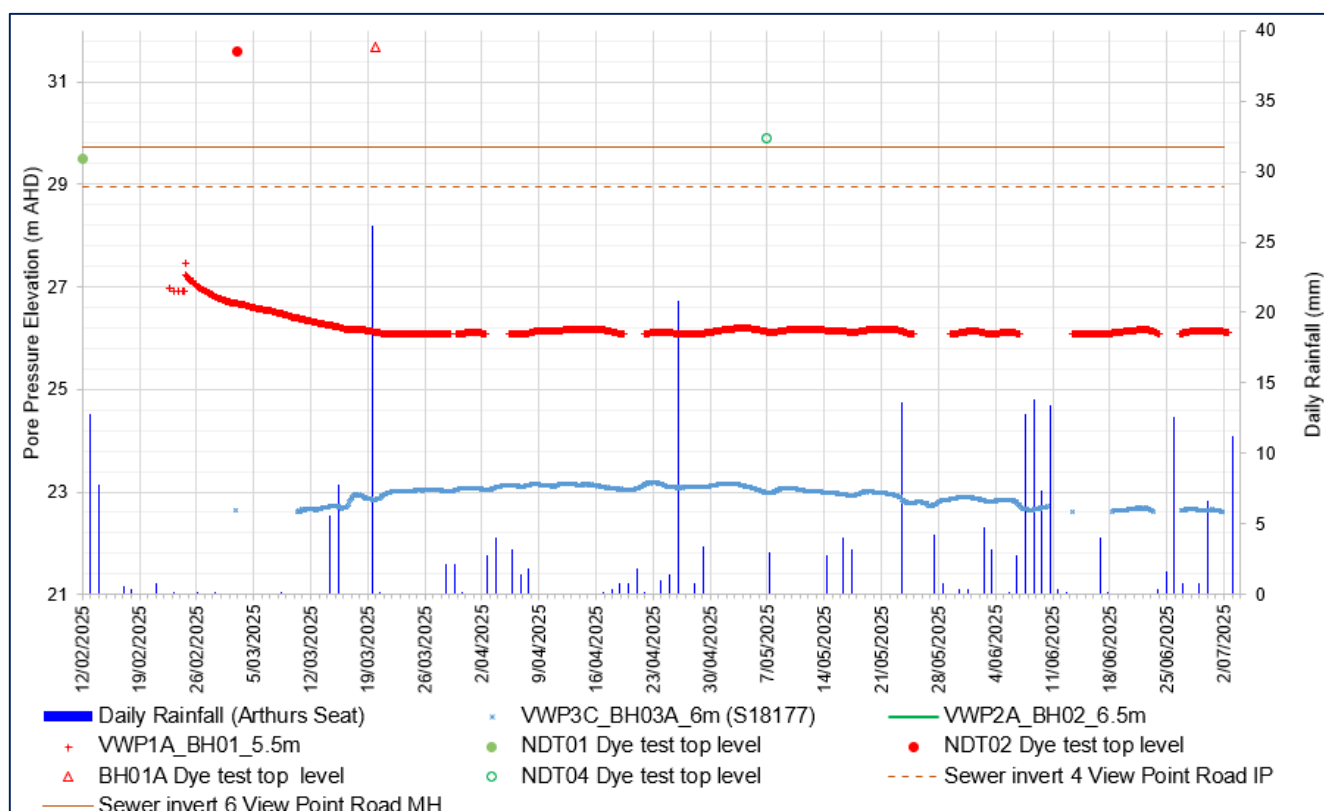
5.5 Dye tracing

73. I completed dye tracing on several occasions and which is summarised in Table 2. I used green and red dyes. On 7 May 2025 Mr Oliver Stirzaker completed dye tracing on my behalf (ref. Section 5.1 of PSM5665-070R, 13 June 2025).
74. MPSC Building Surveyors completed dye tracing of the View Point Road stormwater system on 7 and 10 January 2025. From my discussions with Matt Glover of MPSC the following outcomes were observed by the MBS:
- (a) Green dye was observed along the length of View Point Road and to the outlet. No green dye was observed in the landslide water during the weeks of 6/01/2025 or 13/01/2025.
 - (b) Red dye was added to 7 Prospect Hill Road stormwater pit and this dye was not readily traced along View Point Road. No red dye was observed in the landslide water during the weeks of 06/01/2025 or 13/01/2025.

75. Figure 7 highlights where dye was added to various borehole locations and the outcome of the dye testing. Only dye from borehole NDT01 was observed at the headscarp of the 2025 Landslides. I note that this borehole is located within the private sewer trench of 6 View Point Road. The borehole is approximately 6 m down slope from the SEW sewer main on View Point Road where borehole NDT02 is located, Figure 11.
76. I have plotted the dye tracing dates against groundwater monitoring of shallow VWP's, Inset 34. The results indicate to me that:
- (a) Dye flowed to the 2025 Landslide when piezometric levels in BH01 were above RL 27 m AHD (I note that wet soils were encountered in borehole BH01 at RL 27.19 m on 19/02/2025).
 - (b) No dye flowed to the 2025 Landslide when piezometric levels in BH01 were below RL 26.7 m AHD.

Table 7 – Summary of dye tracing

| Date | Source of Dye | Dye Colour | Location | Approximate volume of water added (litres) | Outcome |
|----------------------|---------------|---------------|--|--|---|
| 7 to 10 January 2025 | MPSC MBS | Green and Red | Prospect Hill Road and View Point Road | NA | No dye observed at headscarp of 2025 Landslide. Red dye not traceable from 7 Prospect Hill Road into View Point Road pipes. |
| 12 February 2025 | PSM | Green | Borehole NDT01 on 6 View Point Road | 120 | Dye tracing started at 11:54am. Green hue observed by DRP on same day by no later than 1:2pm. High confidence flow path from NDT01 to 2025 Landslide. Note that water was added to NDT01. Refer to photos 19 to 23 of Appendix D. |
| 3 March 2025 | PSM | Red | Borehole NDT02 | 150-200 | No red dye has been observed in the 2025 Landslide headscarp to date |
| 20 March 2025 | PSM | Red | Borehole BH01A | 40 | No red dye has been observed in the 2025 Landslide headscarp to date |
| 7 May 2025 | PSM | Green | Borehole NDT04 | 300 | No green dye has been observed in the 2025 Landslide headscarp since the date of the test |



Inset 34: Shallow VWP groundwater monitoring and dye tracing levels

5.6 Stormwater Flow

77. On 26 and 27 June 2025 two flow gauges were installed in the Viewpoint Road stormwater system.
78. Flow gauges were installed immediately upstream of the stormwater pit at the corner of View Point Road and Prospect Hill Road and immediately upstream of the stormwater pit outside 10-12 View Point Road on the northern kerb, Inset 35. The stormwater pipes at these locations comprise 300 mm diameter concrete pipes.
79. The following instrumentation was installed at each location, Inset 36:
 - (a) A small v notch weir. Note these were not intended to act as true v-notch weirs and were installed to “build up” the water level to facilitate operation of other instrumentation and to allow for base and low flows to be measured manually.
 - (b) A Starflow QSD Model 6527B sensor and data logger. This instrument measured flow using a combination of pressure sensors (to measure water depth) and ultrasonic doppler (to measure velocity). The instrument was installed 1.5 metres upstream of the pit to mitigate the effects of the pipe opening and weir.
80. Manual measurements were taken at upstream and downstream weirs at nominally 1-minute intervals over a nominal 10-minute period. This was undertaken twice on 3 July 2025 between 11:01 and 11:10 am and 11:26 and 11:36 am. The results are summarised in Table 8.
81. Manual flow measurements were also taken at an intermediate pit on the 26 and 27 June 2025 and 3 July 2025. The results are summarised in Table 9.
82. Note that rainfall was recorded at Arthurs Seat in the hours prior to some stormwater flow measurements, Inset 37. Considering the antecedent rainfall, the stormwater flow measurements indicate to me that base flows in the View Point Road stormwater system are in the order of 3 litres per minute. In my opinion these base flows may be originating from 7 Prospect Hill Road and may be sourced from a spring, Section 6.3.



Inset 35: Locations of stormwater flow gauges



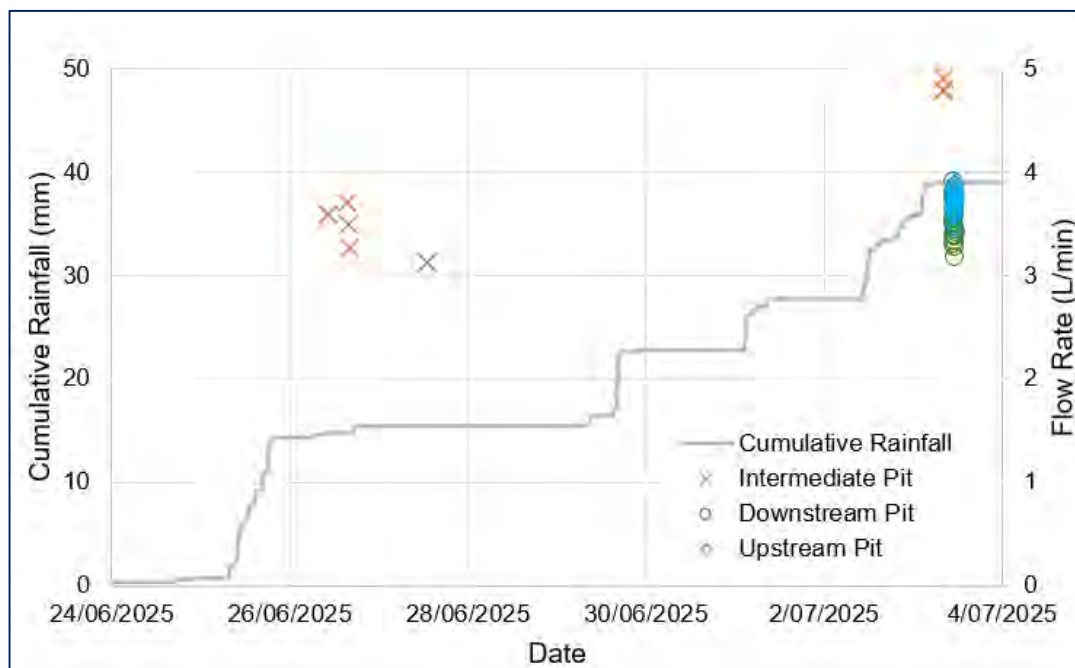
Inset 36: Installation of Starflow sensor (left) and flow measurement from weir (right).

Table 8 – View Point Road Manual Stormwater Loss Measurements

| Test | Average Flow Rate (L/min) [standard deviation] | | Calculated Water Loss (%) |
|-------------------------------------|---|----------------|---------------------------|
| | Upstream Pit | Downstream Pit | |
| #1 3 July 2025 11:01 to 11:10 am | 3.7 [0.1] | 3.7 [0.2] | 3% |
| #2 3 July 2025 11:26 to 11:36 am | 3.8 [<0.1] | 3.5 [0.2] | 9% |

Table 9 – View Point Road Manual Stormwater Flow Measurements

| Date | Time | Flow Rate (L/S) |
|------------|-------|-----------------|
| 26/06/2025 | 10:17 | 3.6 |
| | 10:19 | 3.6 |
| | 10:20 | 3.6 |
| | 15:34 | 3.7 |
| | 15:36 | 3.5 |
| | 16:05 | 3.3 |
| 27/6/2025 | 12:49 | 3.1 |
| | 12:52 | 3.1 |

**Inset 37: View Point Road stormwater flow measurements**

6. Geotechnical Model

83. For detailed information on the geomorphology of the landforms and terrains of the broader McCrae area refer to Section 4 of the PSM LRA. Landform and terrain terminology is consistent with the PSM LRA.

6.1 Surface Conditions

84. I mapped surface conditions at the location of the 2025 Landslides throughout 2025. I have used past photographs and surveys to compile my best estimate of surface conditions prior to the construction of the RW. Note that two RWs were constructed:

- (a) A post and panel RW constructed at some time in early 2022. That is “**the 2022 RW**”. I have not observed any formal drawings of this wall that correlate with my observations of the RW.
- (b) A post and panel RW constructed at some time in early 2024. That is “**the 2024 RW**”. I note that the 2022 RW was not removed as part of the construction of the 2024 RW. I have observed formal “For Review” drawings of a RW at the time that this wall was constructed. I note that the drawings do not depict the 2024 RW. i.e. in my opinion the RW on the drawings was not built.
- (c) My interpretation of surface conditions in late 2023 is presented in Figure 8. I have included the location of trees that have been removed at some stage prior to 2023. From consideration of Nearmap imagery, it is my opinion that at least two trees were removed between 29 April and 1 November 2021, Figure 8 and C21 of Appendix C. Dimensions of key features such as planter boxes (galvanised and timber) have been measured from the debris of the 2025 Landslides where individual elements were identified in the Pointerra Reality Model, Section 7.1. Timing of the additional planter boxes is highlighted in C21 and C22 of Appendix C.
- (d) My interpretation of surface conditions on 6 January 2025 is presented in Figure 9. Note that I have used the Pointerra Reality Model to estimate lengths, thicknesses and elevations based on features that were present at the time of the inspection and at the time of the drone survey (16 January 2025). I have provided a detailed description of the 6 January 2025 landslide in Section 6.3.2.7 of the PSM LRA. Further discussion of the 6 January 2025 landslide is provided in Section 7.
- (e) My interpretation of surface conditions on 14 January 2025 is presented in Figure 10. These observations are supported by the Pointerra Reality Model and the 16 January 2025 LiDAR data. As such, the accuracy of measurements and slope angles are limited by the accuracy of these models. I have provided a detailed description of the 14 January 2025 landslide in Section 6.3.2.8 of the PSM LRA.

6.2 Subsurface Conditions

- 85. I have included detailed descriptions of subsurface conditions in Section 3 of the PSM LRA. This section provides extension on those descriptions as required to inform my opinions on causation.
- 86. I provide interpretation of the sub-surface conditions as a combination of surface condition observation plans and long sections (refer to Figure 9 to Figure 14 for details).
- 87. Three geotechnical units that are described in further detail in this section include:
 - (a) FILL – with distinction between recent and older fills provided and the evidence that significant bulk earthworks have been conducted in the community over a period of decades.
 - (b) Colluvium – with a focus on the persistence of this unit from slopes in the vicinity of Bayview Road/Outlook Road and the escarpment in the EO Area.
 - (c) Gully alluvium – which was documented by Neilson (1966) in the investigations for the Dromana Sewer Tunnel (refer Inset 15 of the PSM LRA) and subsequently I observed in multiple locations during the investigations regarding the sewer and stormwater trenches and in mapping the 2025 Landslides.
- 88. I have completed interpretation of Cone Penetration Tests (CPTs) and these results are included in Appendix F.

6.2.1 Fill

- 89. Detailed description of FILL is included in Section 3.2 and Table 3 of the PSM LRA. I note that there are several layers of FILL within the headscarp of the 2025 Landslide. At Section 1, Figure 11, there are at least three layers of FILL and which includes:
 - (a) Recent FILL (referred to herein as “FILL RW”, Figure 11) that in my opinion was placed as part of the 2022 and 2024 RW construction. This is supported by the location of the geotextile unit beneath the layer, the Pointerra Reality Model, the difference between the property owners 2014 feature survey and current survey levels and observations that I have completed on Site. In my opinion there should be at least 2 m thickness of this layer at the location of the maximum retained height of the 2024 RW.
 - (b) 6 View Point Road FILL (“FILL-6VP”) that was placed as part of earthworks for the current dwelling on 6 View Point Road and which would have been completed in 2002/2003 (refer to Table 6).

- (c) Older Fill (referred to herein as “OLD FILL-01” and “OLD FILL-02”, Figure 11). It is my opinion that the Older Fill layers were in placed no later than the 1970s (refer to Table 6). These fill layers are in my opinion likely to have been end dumped over the escarpment at the time of placement and with no engineering control. This is supported by the presence of these layers in the headscarp of the 2025 Landslide and these layers not being present in borehole HA01, Figure 13. That is, the dark grey fills of Section 1, Figure 11, are not observed in borehole HA01. Furthermore, the Site Conditions survey for 6 View Point Road indicates to me that a significant portion of the gully had already been filled by 2003 (Refer to Table 6). It is my opinion that the Older Fill was placed over the existing steep gully terrain without any preparation of the gully slope. In my experience remediating old sideling fill batters for The Department of Transport and Planning (**DTP**) (refer to Great Ocean Road and Inland Routes projects of my CV, Appendix B) this was common practice in bulk earthworks in that period of time. At the location of the 2025 Landslide headscarp and on the boundary of 6 View Point Road and 10-12 View Point Road, the depth to the base of the Older Fill is inferred to be in the order of 1.9 m to 2.0 m below surface level.
90. Based on this interpretation I have developed an estimate of volumes of these fill layers that were impacted by the 2025 Landslide, Table 10. Note that the OLD FILL volumes are only those that have been evacuated from the 2025 Landslide. The total OLD FILL volumes are anticipated to be slightly higher due to that remaining on the eastern flank of the 2025 Landslide, Figure 13, and in the 2025 Landslide headscarp. These volumes will be updated once the Site has been remediated and mapped in detail. I have used:
- (a) LiDAR survey from 2019 and 2023.
 - (b) Feature Survey from 10-12 View Point Road completed in 2014 (Table 6).
 - (c) The Diospatial LiDAR survey from 16 January 2025.
91. I note that there is some variability in the volume estimates of the Older Fill layers due to the variation in accuracy of the 2019 and 2023 LiDAR surveys. Note that I do not anticipate this range of volumes for the Recent FILL due to the availability of the survey completed by a licensed surveyor in 2014 and the comparison with Diospatial LiDAR survey from 16 January 2025.
92. With regards to the FILL-6VP layer I have aligned the Site Conditions survey that has relative levels (Table 6) with Australian Height Datum (AHD) by checking the difference in levels between the two files at locations where no obvious changes in slope have occurred. For example, in the southeastern corner of the property and on the northern extent of the escarpment. I have checked this for consistency with FILL that I logged in borehole HA02. The difference in levels in these drawings is approximately 19 m. In my opinion, this layer of fill does not extend across the escarpment or into 10-12 View Point Road in a significant thickness that is readily discernible in the 2025 Landslide headscarp, Figure 14.
93. Note that further evidence of significant Older Fill is documented in the Flinders Council Margaret Street drain works (Table 6 and Paragraph [33(e)]). The upper tributary of the Margaret Street Drain was backfilled as part of the MPF construction. i.e. the area underneath the Freeway between the Boulevard and Waller Place, Inset 27.

Table 10 – Summary of my interpretation of total fill volumes

| Fill Layer | Lower bound estimate (m ³) | Upper bound estimate (m ³) |
|---|--|--|
| FILL-6VP | - | 50 |
| FILL-6VP and associated with 2025 Landslides | - | <2 |
| FILL RW | - | 30 |
| OLD FILL and evacuated by the 2025 Landslides | 260 | 305 |
| 5 January 2025 Failure Volume | 15 | 20 |

6.2.2 Colluvium

94. Colluvium has been described in detail in Section 3.2 and Table 3 of the PSM LRA. I note that this geotechnical unit is inferred to be present:
- (a) In most boreholes between Bayview Road and the 2025 Landslide. For example,
 - i. Borehole NDT013 immediately beneath the sewer invert on Outlook Road (refer to Figure 1 of PSM5665-070R) and which included SAND with clay, gravel, cobbles and boulders to 250 mm diameter, Inset 38.
 - ii. Boreholes 1 to 4 on View Point Road (Refer to Appendix A of the PSM-GFR).
 - (b) In the head of the old gully above the MPF, Inset 27 and Inset 38.
 - (c) In the hand augers excavated in June 2025, Appendix F.
 - (d) In the upper soils of the CRB boreholes summarised in Section 3.2. In my opinion the descriptions of “Sand with granite pieces” is consistent with my observations of Colluvium at similar depths across the plateau slopes.
95. It is my opinion that the Colluvium unit is present as a broad apron across the plateau slopes which extend from above Bayview Road and down to the escarpment. The Colluvium is thinner to not present in zones near the invert of creeks and gullies where stream erosion evacuates the material (refer to Photos 33A and 33B of Appendix D) and below the escarpment crest (refer to Inset 6 of the PSM LRA) where ongoing coastal erosion has evacuated this unit. This is shown in Section on Figure 11 and 12.
96. In my opinion the base of this unit is likely to have a high permeability where it has a significant proportion of cobbles and boulders in a soil matrix. Furthermore, the base of this unit is likely to have significantly higher permeability than the underlying Residual Soil and XW Granite (refer to Table 3 of the PSM LRA) due to the increase in clay content in the Residual Soil and XW Granite.



Inset 38: Inferred Colluvium recovered from NDT13 showing SAND and a BOULDER



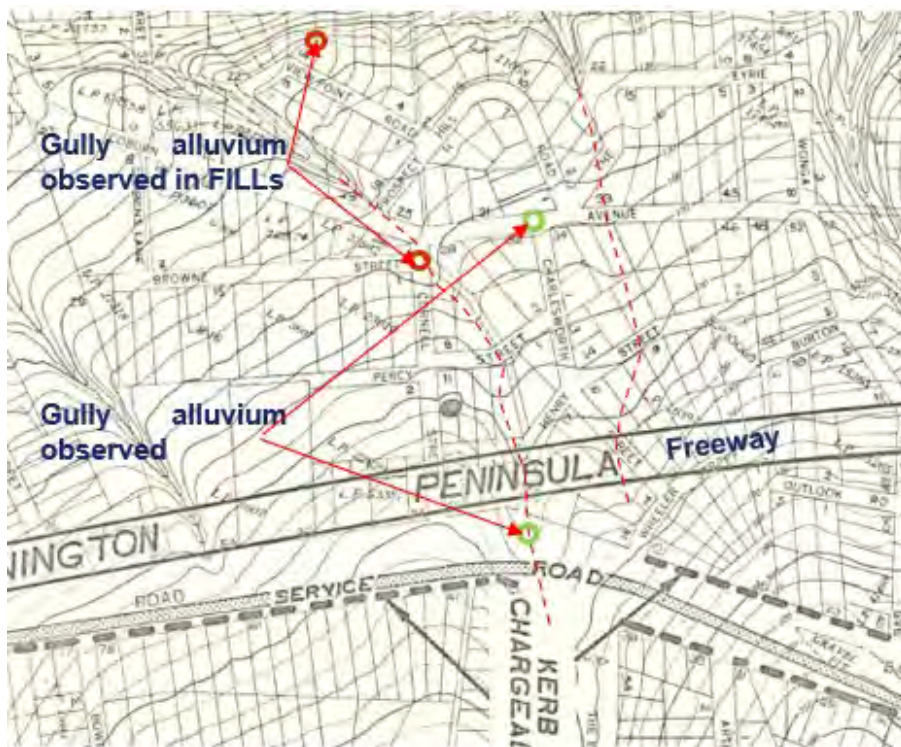
Inset 39: Inferred Colluvium at surface of the gully between Bayview Road and MPF. Refer to Inset 27 for location.

6.2.3 Gully Alluvium

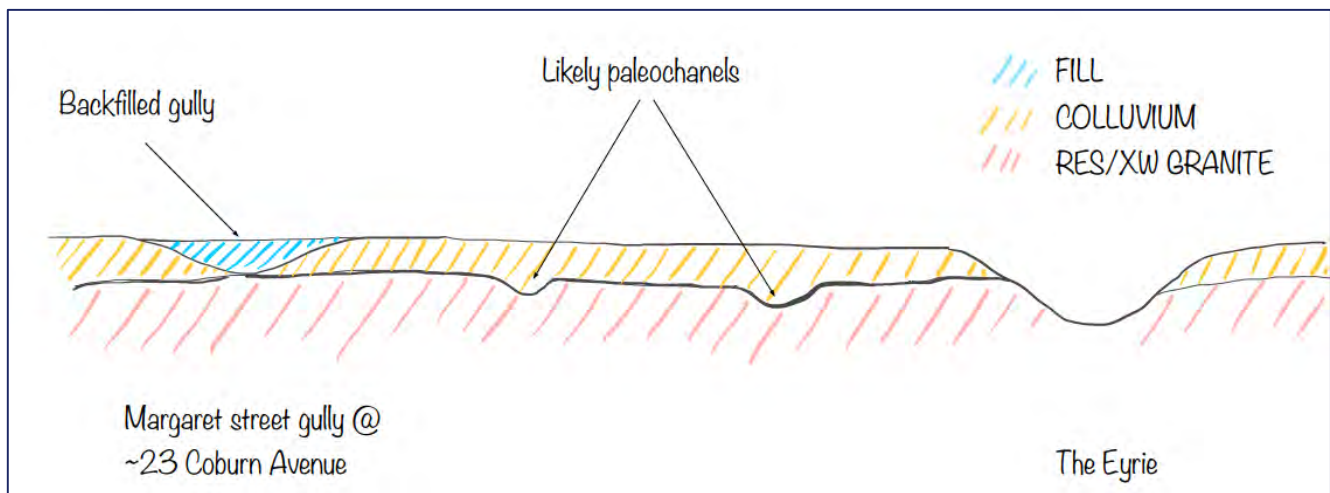
97. Gully alluvium is present in proximity to natural drainage lines on Arthurs Seat. This has been observed:
 - (a) In borehole log reports of the Dromana Sewer Tunnel (refer to Inset 15 of the PSM LRA and Neilson (1966)) and which indicate in borehole DT/11 that "*Ligniteous Clays and Silts*" were buried by surficial soils at approximately 4.3 m from surface level. In my opinion this is direct evidence of buried paleochannels.
 - (b) In the subgrade of the MPSC subgrade repairs of Coburn Avenue (Refer to Section 6.1 of PSM5665-070R). I note that the CBR01 sample had 50% Clay fraction and a soil particle density of 2.52 t/m³ (refer to Appendix C of PSM5665-070R (pdf page 65)).
 - (c) In borehole BH14A and BH14B of the PSM sewer and stormwater investigation (Refer to Appendix A of PSM5665-070R) from 2.2 m below surface level, Inset 40.
 - (d) In the OLD FILL inferred to be present on the eastern flank of the 2025 Landslide, Figure 13.
98. The gully alluvium in a natural deposition environment indicates to me that several gullies and tributaries of those gullies may be present and at least partially backfilled between the Boulevard and the escarpment and which includes the drainage paths that lead towards the Margaret Street Drain and the Eyrie, Inset 41. Given the age of the landform, in my opinion it is feasible that there are buried paleochannels in the plateau slopes between the Eyrie and the Margaret Street drain, Inset 43.



Inset 40: Inferred Gully Alluvium encountered at NDT14A



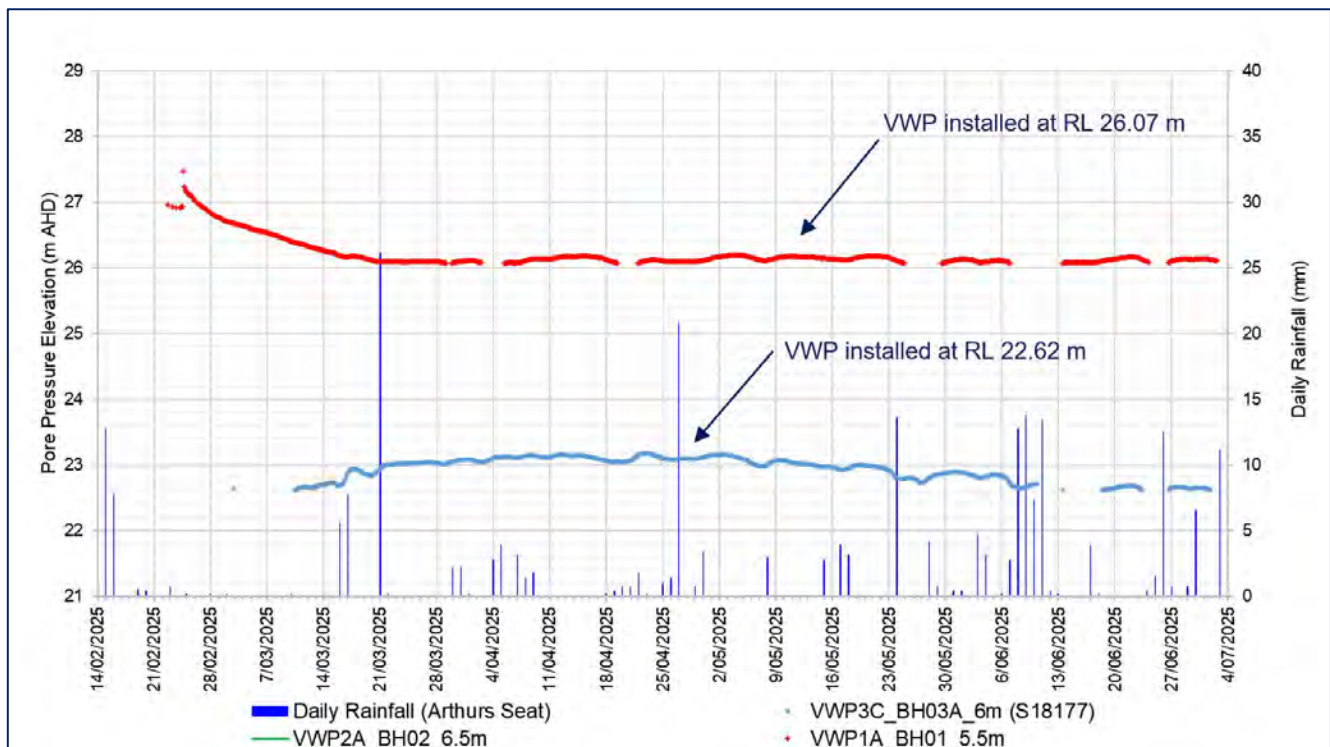
Inset 41: Excerpt from “Shire of Flinders General File SF19997 Part 6 (pdf page 166) and with my mark up of drainage paths in red.



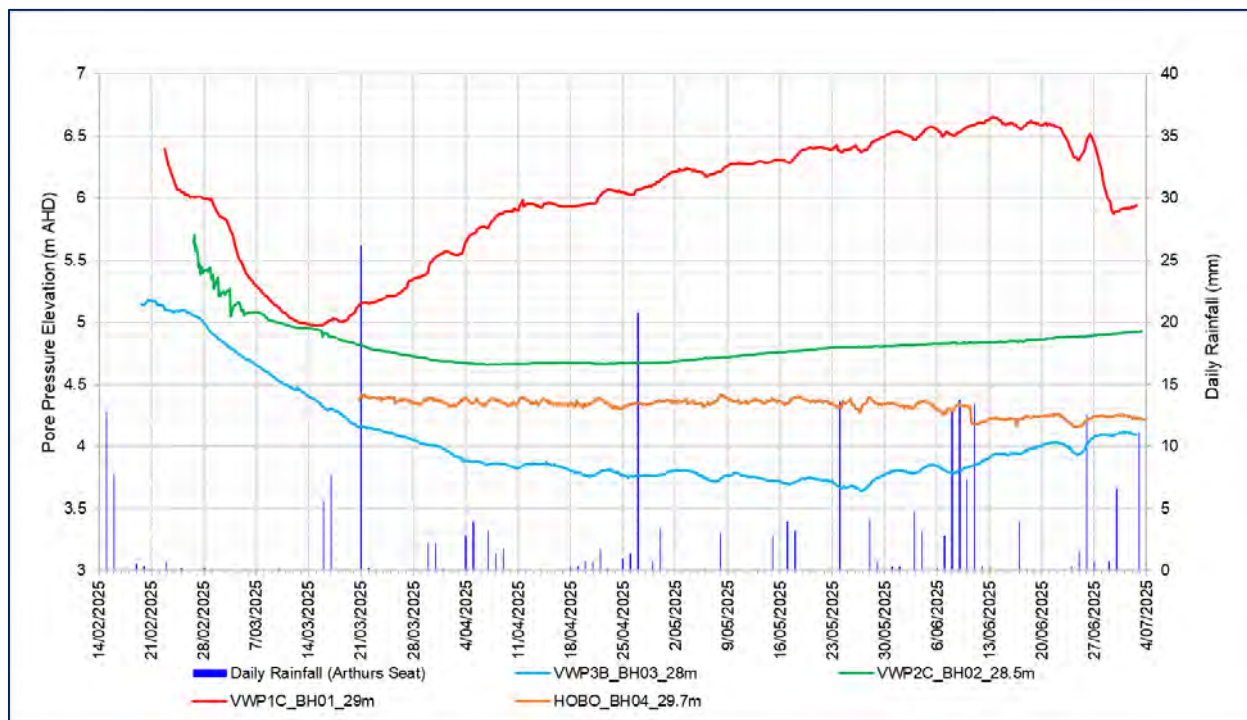
Inset 42: Schematic sketch showing inferred buried paleochannels

6.3 Groundwater

99. I provided my groundwater model in Section 5.2 of the PSM LRA. I have updated the groundwater plots in Insets Inset 43 and Inset 44. Note that I refer to shallow groundwater that is observed in the upper surficial soils (such as FILL, COLLUVIUM, ALLUVIAL/MARINE deposits, Table 3 of the PSM LRA) above the Residual Soil and XW Granite as the **"Leaky Surficial Aquifer"**.



Inset 43: Shallow groundwater in VWP monitoring on the escarpment



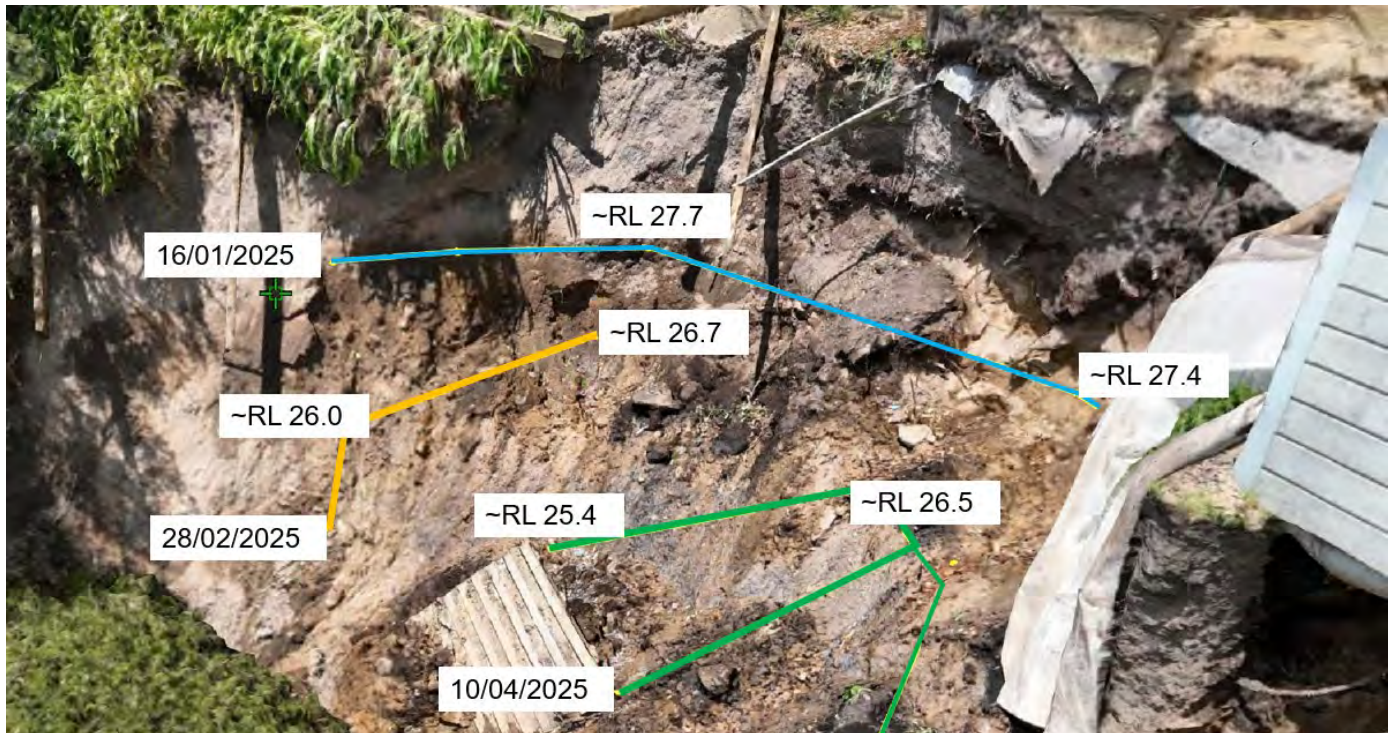
Inset 44: Deep groundwater in VWPs and HOBO monitoring on the escarpment

100. My observations of groundwater at the time of the Diospatial Reality Model survey and the intrusive investigations between 16 January 2025 and February 2025 are plotted on Figures 11 and 12.
101. I note that shallow groundwater was reported by others:
- On 5 Prospect Hill Road in 2019 (ref. paragraph [31(a)]).
 - At 7 Prospect Hill Road on 3 March 2021 (ref. paragraph [32]).
102. I note that the northern portion of 7 Prospect Hill Road is consistently green in aerial photographs and this trend extends back to the earliest colour aerial photographs of 1970, Inset 45. It is my opinion that the consistent observations of near surface seepage and shallow groundwater on 5 and 7 Prospect Hill Road are most likely associated with a spring. The contribution of leaky services should be investigated further in this area as in 2025 this seepage was at least partially influenced by a private water main leak on 5 Prospect Hill Road.

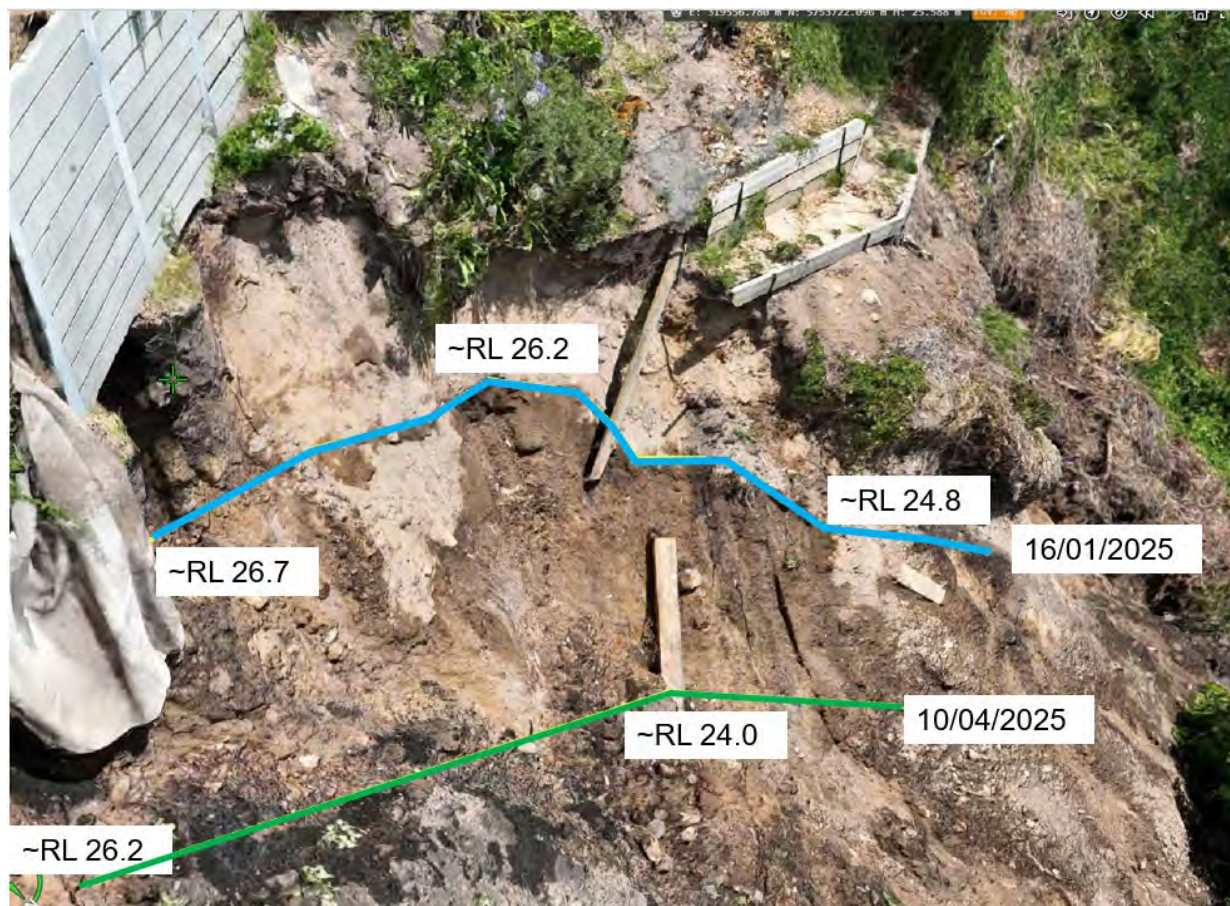


Inset 45: 1970 Aerial with inferred near surface soil moisture

103. I measured flow rates of the seepage from the 2025 Landslide:
- (a) 6 January 2025 – no less than 0.15 to 0.2 litres per second measured with a 600 mL bottle. This approximates to 13,000 to 17,000 litres per day.
 - (b) 16 June 2025 – no less than 50 litres per day. I note that I had to use a 12 mL syringe to measure this rate.
104. I note that neither of these seepage measurements represent the maximum seepage at those times. These rates represent what was practical to measure at those times.
105. My routine photographs of seepage points in the 2025 Landslide headscarp progressively show a decrease in the elevation of the seepage points with time. The seepage lines are discussed further in Section 6.3. This change is illustrated on the Pointerra Reality Model on the eastern flank of the 2025 Landslide, Inset 46 and the western flank of the 2025 Landslide, Inset 47.



Inset 46: Eastern flank of the 2025 Landslides with interpretation on Pointerra Reality Model of the change in levels of seepage points with time



Inset 47: Western flank of the 2025 Landslides with interpretation on Pointerra Reality Model of the change in levels of seepage points with time

7. Stability Assessment

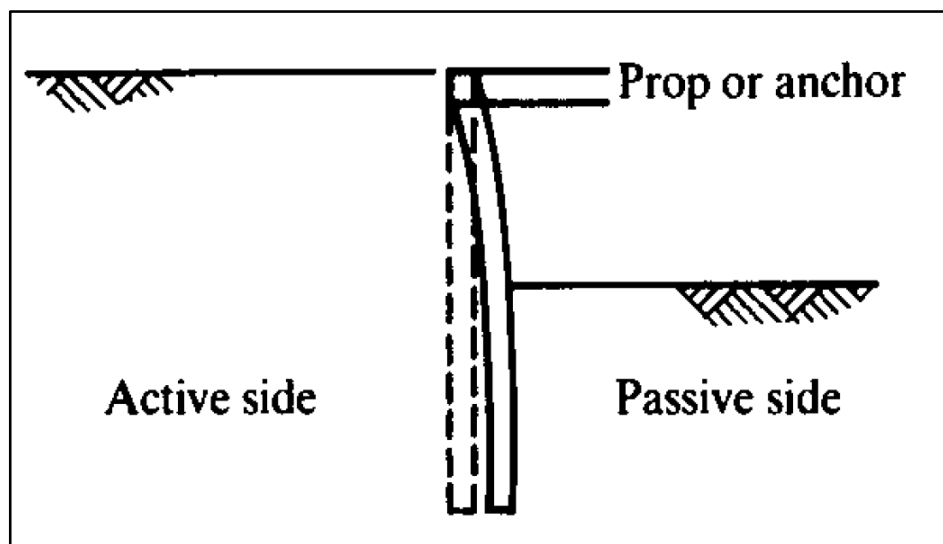
7.1 Retaining Wall Characteristics

106. I have not been provided with a set of drawings that represent the as-constructed form of the 2024 RW. I was not provided details of how the 2022 and 2024 RWs were designed in the week between the 6 and 14 January 2025. I was informed by the property owner of 10-12 View Point Road on 6 January 2025 that the 2024 RW piers had a socket into the underlying equivalent of the Residual soil/XW Granite.
107. I have used the Pointerra Reality Model to measure up key aspects of the wall. Excerpts are included in Appendix H and which includes:
 - (a) Up to 2 m of retained height.
 - (b) The posts and mass concrete piers of the 2022 RW were not demolished.
 - (c) Channel section tie backs were installed to the back of the 2022 RW uprights. I have estimated using the Pointerra reality model that the channel sections are 100 wide by 40 mm deep.
 - (d) I have estimated the strength of the weld based on Section 9.6.3.10 of AS4190. I have calculated a weld connection strength of 145 kN, Appendix H. This should be confirmed by a Structural Engineer once the connection can be confirmed during demolition. Nonetheless, in my experience this tie back capacity is similar to that of a 20 mm rock bolt which are often used as anchors for similar walls.
 - (e) There is evidence of a tie-back pier in Nearmap imagery – the details of this are unknown, refer to Slide 5 of Appendix H.
 - (f) Up to 0.4 m surcharge provided by planter boxes. This equates to a UDL of ~ 2 kPa across the garden area.
 - (g) A geotextile was placed up to 0.6 m below surface level.
 - (h) Single size aggregate was placed between the two RWs

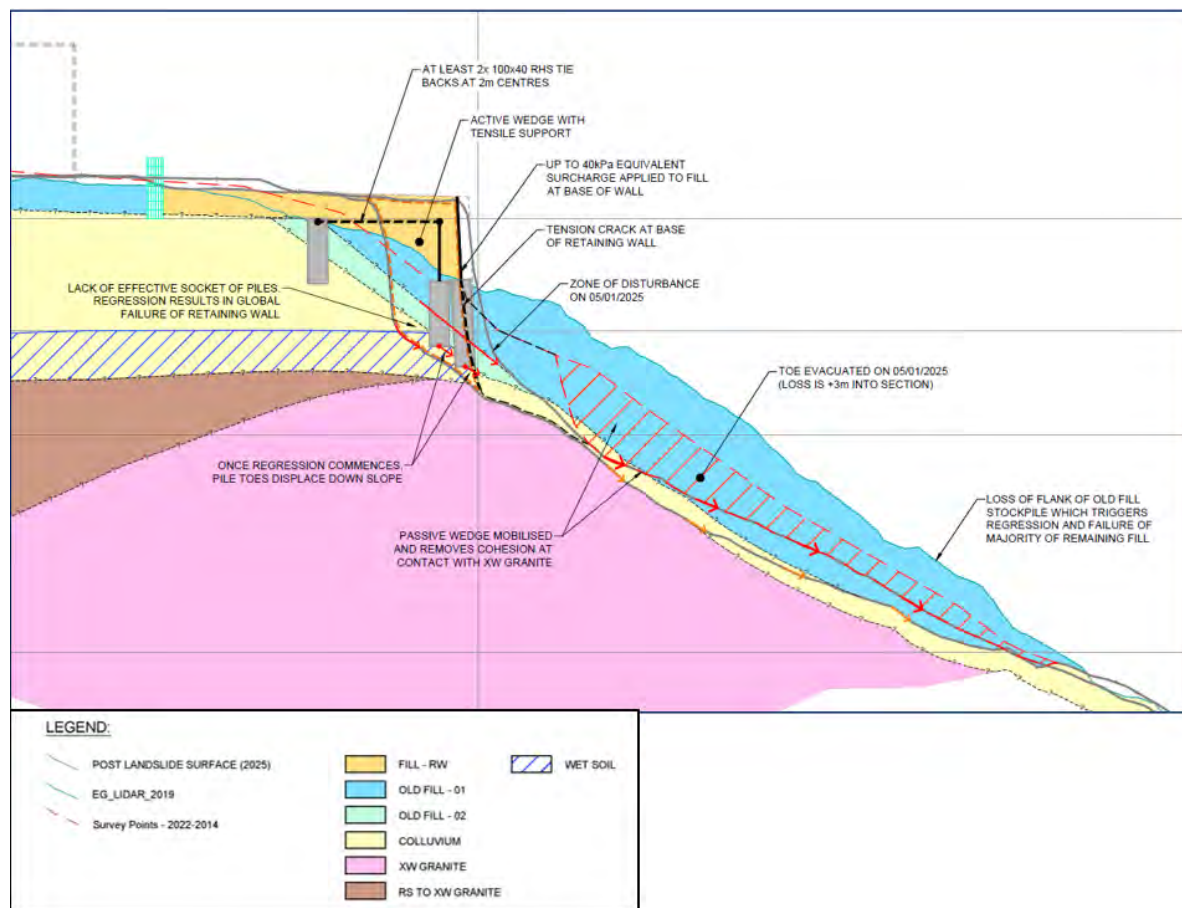
108. In my opinion the RW characteristics at least partially control the behaviour of the 2025 Landslides and assist in developing an understanding of the behaviour of the 2025 Landslides.
109. Screen shots of key aspects from the Pointerra Reality Model are included in Appendix H

7.2 2025 Landslides - Mechanism of Failure

110. I introduce the broad mechanisms of failure of the 2025 Landslides in Section 7 of the PSM LRA.
111. This section provides an extension of those details. In this section I refer to the active and passive wedges of the RW, Inset 48. I provide a sketch of the mechanism of failure and regression in Inset 49.
112. As per the PSM LRA both 2025 landslide events were a translational slide and with a debris flow. I note:
- (a) Groundwater and seepage were evident from the 5 January 2025 and the extent of which became more apparent on 14 January 2025.
 - (b) The 5 January 2025 failure extended back to the 2024 RW, Inset 50. On the 6 January 2025 there were no apparent tension cracks behind the 2024 RW. Movement continued at the tension crack location, Inset 51 on 13 January 2025. At this time, tension cracks behind the 2024 RW had not been observed or reported by others.
 - (c) The loss of the toe of the landslide on 5 January 2025 effectively undercut the unretained slopes of OLD FILL to the east of the 2024 RW, Figure 13. In my opinion this is a similar action to an unrestrained cut at the toe and along the flank of the OLD FILL slope. In addition to this, the movement associated with the 5 January 2025 Landslide in my opinion removed any effective cohesion at the contact with the XW Granite. That is, strengths of the slope materials were reduced by the failure. In my opinion, these two factors contributed to the ultimate regression of the 14 January 2025 Landslide,
 - (d) The ultimate regression of the 14 January 2025 Landslide was controlled by:
 - i. The characteristics of the OLD FILL including lithology, placement method, slope angle.
 - ii. The basal angle of the gully.
 - iii. The placement of FILL-RW associated with the 2022 RW and the 2024 RW.
 - iv. The lack of effective retention systems on the eastern boundary of 10-12 View Point Road. For example, significant planter boxes were installed down slope of the 2024 RW and based on aerial photography, Appendix C, the 2024 RW did not extend to the property boundary.
 - v. The lack of effective socket into the XW Granite for several of the piers associated with the 2022 RW and the 2024 RW, Appendix H. The lack of socket had two key impacts:
 - (A) The 2024 RW was vulnerable to global failure as the stresses from the active wedge of the RW could not be distributed to the competent materials, such as XW Granite, on the passive side of the RW.
 - (B) The pier toes could displace and move down slope and destabilise the active wedge of the RW.
 - (e) In my opinion a simplified method to demonstrate the progressive increase in driving forces at the 2025 Landslide is to consider how the overall slope angles changed with time, Inset 52. I note At Section 1, Figure 10:
 - i. The overall natural slope angle of the gully (measured from the crest of the slope to the toe of the 2025 Landslide was approximately 29°.
 - ii. The overall slope to the crest of the OLD FILL was 32°.
 - iii. The overall slope to the crest of the 2024 RW was 37°.
 - (f) In my opinion this increase in overall slope angle to more than the typical angle of repose of end tipped fills without effective resisting forces from the piers of either the 2022 RW or the 2024 RW has resulted in the overall slope being fundamentally unstable. This is based on engineering principles and my experience with uncontrolled fill performance in mining and quarrying operations (Refer to Norwich Park, Burton Coal Mine and Wollert Quarry in my CV, Appendix B). In my opinion, without the need for stability analysis, the ultimate slope constructed with the 2024 RW was fundamentally unstable with or without any groundwater. Nonetheless, I provide supporting evidence of this opinion in the form of stability analysis in Section 7.3.



Inset 48: Characteristics of a RW, excerpt from Atkinson (2007)⁴



Inset 49: Inferred mechanism of failure

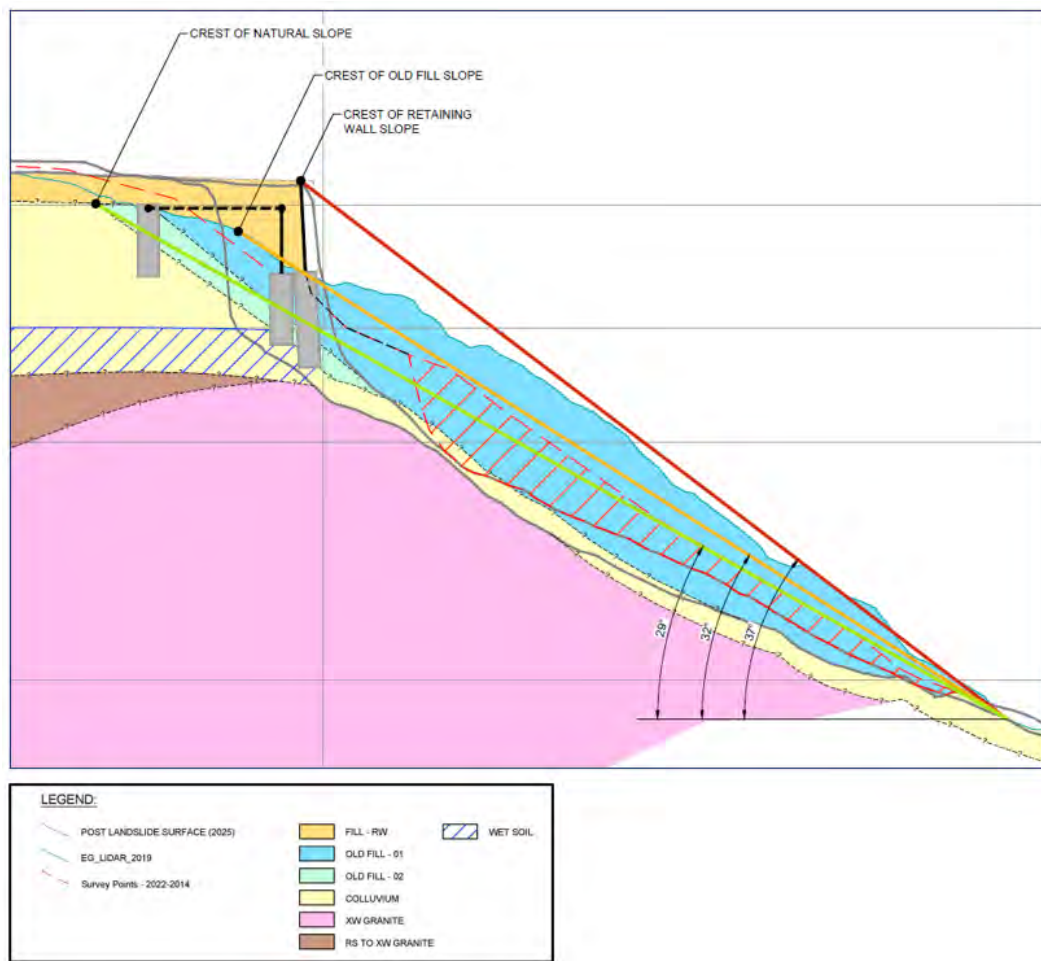
⁴ Atkinson, J. (2007). The Mechanics of Soil and Foundations. Taylor and Francis.



Inset 50: 2024 RW on 6 January 2025. Refer to Figure 9 for tension crack location in plan. I note that the concrete panels are 200 mm in height



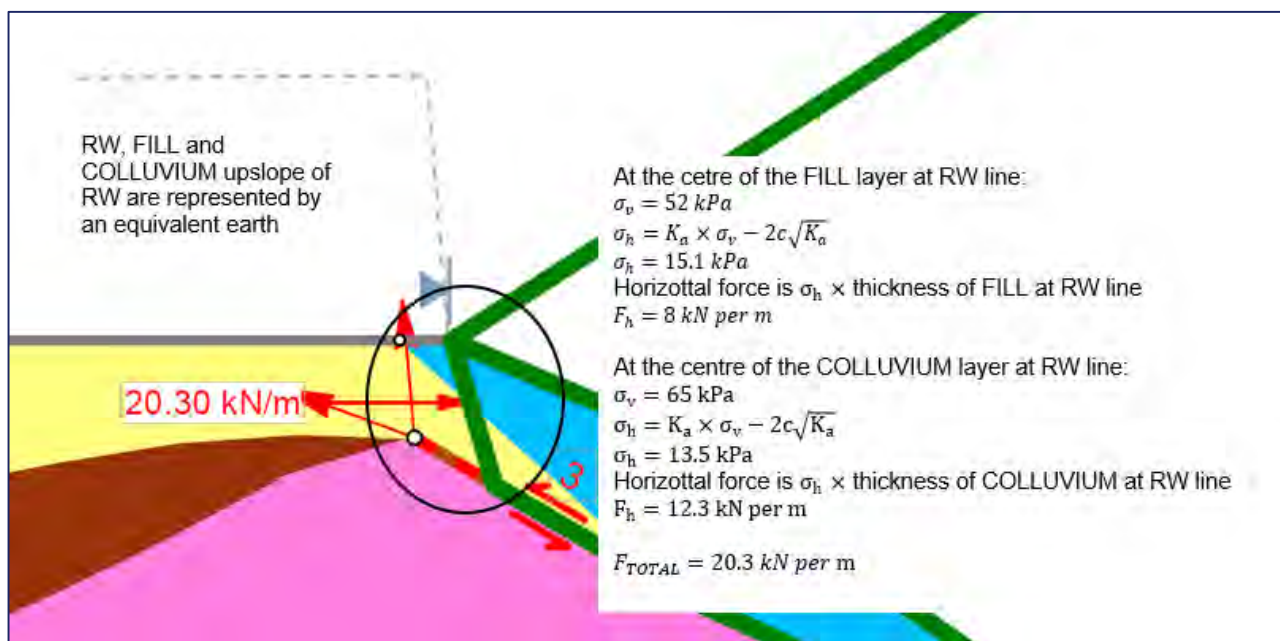
Inset 51: 2024 RW on 13 January 2025 (source:MPSC)



Inset 52: Increase in slope angles

7.3 Back Analysis

113. I have completed a series of back analyses using the limit equilibrium Rocscience Software SLIDE (Version 9.038 Feb 28 2025). This analysis is based on feature surveys (Table 5) and LiDAR surveys from prior to construction of the 2022 RW. The geotechnical model of the 2025 Landslide and the measurements of the 2022 RW and 2024 RW should be validated when the 2025 Landslide is remediated and when it is safe to access this area. Nonetheless, observations have been derived based on the Pointerra Reality Model with the accuracy described in Section 2.5 of the PSM LRA. I do not expect significant changes in the interpretation of geotechnical units exposed in the Pointerra Reality Model. Validation of the model is anticipated to be helpful in defining details of the 2022 and 2024 RWs and thicknesses of FILL placed as part of these RWs.
114. I note that back analysis is inherently sensitive to assumptions and that there are several unknowns related to pre-failure geometry and lithology that may never be well understood by simple fact that the 2025 Landslide has destroyed the pre-failure setting. Nonetheless, in my opinion it is useful to demonstrate how stability can deteriorate, or how the Factor of Safety (**FOS**) of a slope or RW can change.
115. With regards to modelling of the 2024 RW failure, the observed tension crack was immediately adjacent to the sub-vertical panels of the RW, Inset 49. To ensure that the failure initiated at this location, I adopted the equivalent horizontal stresses developed by the soils above this point and applied this as an equivalent horizontal force, Inset 53.



Inset 53: Calculation of equivalent horizontal force

Table 11 – Back analysis scenarios

| Scenario | Discussion |
|--|---|
| 2019 LiDAR/2014 Feature Survey – conditions prior to RW construction | <ul style="list-style-type: none"> Prior to placement of FILL-RW unit on 10-12 View Point Road. Groundwater: I have adopted the observed range from 2025, Inset 46 and Inset 47. Mature trees at gully head and lower water table represented by variation in water table. FOS assumed to have been greater than 1.1 at levels consistent with June 2025 water levels and with no cracking observed at the contact with the old gully. |
| 2025/01/05 failure | <ul style="list-style-type: none"> 2022 and 2024 RW construction broadly lifted the garden bed area to RL 30.5 m AHD, Figure 9, and with a further 6 garden beds to RL 30.9 m AHD. Retained height of up to 2 m plus surcharge. 2024 RW construction had to shift further down the escarpment to avoid fouling with existing piers of the 2022 RW. Therefore, increasing the retained height required, Figure 9. The garden beds apply an equivalent surcharge of 2 kPa. Groundwater: as observed on 16 January 2025. Mechanism described in Section 7.2 |
| 2025/01/14 failure | <ul style="list-style-type: none"> Regression of 2025/01/05 failure as described in described in Section 7.2 Groundwater as observed on 16 January 2025. |

7.3.1 Engineering Parameters

116. A summary of the engineering parameters adopted for the analysis is provided in Table 12. These parameters are based on:

- Interpretation of CPT data, Appendix F.
- Iterative analysis via the back analysis process with particular focus on the FILL and the contact with the XW Granite.

Table 12 - Adopted engineering parameters

| Unit | Unit Weight (kN/m ³) | Effective Strength Parameters | |
|--------------------|-------------------------------------|-------------------------------|------------------|
| | γ' | c' (kPa) | ϕ' (deg) |
| FILL (all layers) | 16 | 2 | 30-32 (32) |
| COLLUVIUM | 19 | 0-2 (2) | 35-38 (38) |
| RESIDUAL | 19 | 0-5 (5) | 36-38 (36) |
| XW GRANITE CONTACT | 20 | 2* 0# | 30 |
| XW GRANITE | 20 | 5-15 (10) | 38 |

* Effective cohesion adopted prior to significant slope movement.

Effective cohesion adopted following significant slope movement.

7.3.2 Results

117. The results of the analysis are included in Appendix I and a summary is provided in Table 13.

118. The results of the analysis indicate to me that:

- (a) Prior to construction of the 2022 and 2024 RWs the slope marginally stable under long term and elevated groundwater conditions.
- (b) The 2024 and 2022 RWs and associated filling introduced a destabilising force without addition of effective resisting forces. The planter boxes and elevated vegetable garden beds add further surcharge to the slope. It is my opinion that an FOS of 1.1 is not inconsistent with the unstable behaviour of the 2022 retaining wall.
- (c) Following construction of the 2022 and 2024 retaining walls and associated filling the slope is unstable under elevated groundwater conditions leading to global instability and geotechnical failure of the slope.
- (d) Following the loss of the passive wedge (stabilising force) at the toe it is my opinion that the upslope and retaining wall experienced regressive failure. It is my opinion that the time between the initial failure on 4 January 2025 and the global failure of the slope and retaining wall on 15 January 2025 was associated with tensile elements in RW effectively "holding up" the FILL and COLLUVIUM temporarily. This mechanism is complex and not appropriately represented using simplified limit equilibrium analysis.
- (e) Following the loss of the passive wedge (4 January 2025 Landslide) the FOS significantly less than 1 is in my opinion consistent with the observed landslide behaviour (e.g. debris flow as opposed to a small slump).

Table 13 – Back Analysis Summary

| Scenario | PSM Run ID | Groundwater Condition | Factor of Safety (FOS) | My comments |
|--|------------|-----------------------------------|------------------------|---|
| 2019 LiDAR/2014 Feature Survey – conditions prior to RW construction | Run01 | Long term groundwater (RL 26.2 m) | 1.26 | May not observe evidence of movement |
| | Run02 | Elevated Groundwater (RL27.4 m) | 1.09 | Would likely observe evidence of movement |
| 2024/2025 pre failure | Run03 | Dry | 1.15 | May observe evidence of movement |
| | Run04 | Long term groundwater (RL 26.2 m) | 1.13 | May observe evidence of movement |
| 2025 failure | Run05 | Elevated groundwater (RL27.4 m) | 0.99 | 5 January 2025 Landslide |
| | Run 06 | Elevated groundwater (RL27.4 m) | 0.76 | 14 January 2025 Landslide |

7.4 Retaining Wall Assessment

7.4.1 Design Criteria

119. I have assumed that the relevant version of the National Construction Code (NCC) at the time of the design and construction of the 2022 and 2024 RWs was the 2019 version (NCC 2019, 1 May 2019). Select excerpts from that document include:
- (a) Structural stability and resistance (Part 2.1.1 of NCC 2019, Inset 54).
 - (b) Explanatory information regarding Earth Retaining Structures, (Part 3.1.2 of NCC 2019, Inset 55).
120. The relevant versions of the Australian Standard (**AS**) for Earth Retaining Structures at the time of the design and construction of the 2022 and 2024 RWs was AS 4678 (2002). Note that AS4678 (2002) general application is provided in Inset 56. Regardless of any interpreted exclusion in scope of AS4678 (2002), in my opinion there are several first principles engineering design approaches outlined in AS4678 (2002) that should apply regardless of the scope of the Standard. For example, consideration of sub-surface groundwater and global stability.
121. I assume that it is reasonable to expect a designer to produce a RW design that complies with AS4678 (2002).
122. I have referenced four broad sections of AS4678 (2002) in my response. They do not form an exhaustive list of requirements of the standard however, in my opinion a reasonably experienced and competent engineer would complete a design taking into account the following requirements of the standard:
- (a) Clause 3.1.1 – an introduction to the design requirements, Inset 57.
 - (b) Clause 3.2 – a summary of design considerations for ultimate limit state, Inset 58.
 - (c) Clause 3.3 – a summary of design considerations for serviceability limit state, Inset 59.
 - (d) Clause 3.6.1 – the broad requirements for surface and sub-surface water, Inset 60, which is extended in Appendix J of AS4678-2002, Inset 61.

Performance Requirements

P2.1.1 Structural stability and resistance

(a)

A building or structure, during construction and use, with appropriate degrees of reliability, must—

- (i) perform adequately under all reasonably expected design actions; and
- (ii) withstand extreme or frequently repeated design actions; and
- (iii) be designed to sustain local damage, with the structural system as a whole remaining stable and not being damaged to an extent disproportionate to the original local damage; and
- (iv) avoid causing damage to *other properties*.

by resisting the actions to which it may reasonably be expected to be subjected.

(b)

The actions to be considered to satisfy (a) include but are not limited to—

- (i) permanent actions (dead loads); and
- (ii) imposed actions (live loads arising from occupancy and use); and
- (iii) wind action; and
- (iv) earthquake action; and
- (v) snow action; and
- (vi) liquid pressure action; and
- (vii) ground water action; and

(viii) rainwater action (including ponding action); and

(ix) earth pressure action; and

(x) differential movement; and

(xi) time dependent effects (including creep and shrinkage); and

(xii) thermal effects; and

(xiii) ground movement caused by—

(A) swelling, shrinkage or freezing of the subsoil; and

(B) landslip or subsidence; and

(C) siteworks associated with the building or structure; and

(xiv) *construction activity actions*; and

(xv) termite actions.

(c)

The structural resistance of materials and forms of construction must be determined using five percentile characteristic material properties with appropriate allowance for—

- (i) known construction activities; and
- (ii) type of material; and
- (iii) characteristics of the site; and

Inset 54: Excerpt from NCC (2019) P2.1.1 Structural stability and resistance

Appropriate [Performance Requirements](#) :

Where an alternative earth retaining structure design is proposed as a [Performance Solution](#) to that described in [Part 3.1.2](#), that proposal must comply with—

- a. [Performance Requirement P2.1.1](#); and
- b. The relevant [Performance Requirements](#) determined in accordance with [A2.2\(3\)](#) and [A2.4\(3\)](#) as applicable.

Acceptable Construction Manual**3.1.2.0**

[Performance Requirement P2.1.1](#) is satisfied for an earth retaining structure associated with the construction of a building or structure if it is designed and constructed in accordance with AS 4678.

Explanatory information:

AS 4678 contains requirements for earth retaining structures between 800 mm and 15 m in height, and does not apply to structures which are founded in exceptional [site](#) conditions (e.g. landslips), are subjected to sustained cyclic loading or are used for the purposes of water-retaining (e.g. dams and reservoirs).

It should be noted that [3.1.2.0](#) is only one way of achieving compliance with [P2.1.1](#). Other ways of complying include the following:

- (1) The relevant structural design manuals in [Part 3.0](#).
- (2) The relevant provisions of other Parts of Section 3 relating to earth retaining structures.
- (3) A [Performance Solution](#) that uses one of the other NCC [Assessment Methods](#) which verifies that compliance with [P2.1.1](#) will be achieved.

Inset 55: Excerpt from NCC (2019) P3.1.2 Earth Retaining Structures**1.2 APPLICATION****1.2.1 General**

This Standard is applicable to retaining structures and reinforced soil structures that are commonly constructed for engineering works and infrastructure. Such structures are typically up to 15 m in height.

Structures of unusual shape, of large retained heights (in excess of 15 m) or founded in unusual ground conditions (such as soft ground, land slips, steep sides or deeply inclined gullies), together with structures subject to sustained cyclic loading, are outside the provisions of this Standard.

This Standard does not apply to the design and construction of water-retaining structures (such as dams and reservoirs) or bridge structures.

Inset 56: Excerpt from AS4678 (2002) – Application**3.1.1 Introduction**

This Section sets out the requirements for the design of earth-retaining structures to ensure that strength, stability and serviceability are achieved over the intended life of such structures. Drainage aspects and the influence of construction on the adjacent ground shall be considered. In the initial design process, the selection of an appropriate retaining structure shall consider anticipated site conditions, the constructability of the structure and the need for temporary support measures.

Inset 57: Section 3.1.1 of AS4678-2002

3.2 DESIGN CONSIDERATIONS FOR ULTIMATE LIMIT STATE

Structure classification (see Table 1.1), design life, durability and maintenance of the structure shall be considered as part of the design process.

The design for ultimate limit state shall take into consideration, but not necessarily be limited to, the following six ultimate limit state modes:

- (a) *Limit Mode U1* Sliding within or at the base of the retaining structure (see Figure 3.1(A)).
- (b) *Limit Mode U2* Rotation of the structure (see Figure 3.1(B)).
- (c) *Limit Mode U3* Rupture of components and connections (see Figure 3.1(C)).
- (d) *Limit Mode U4* Pull-out of reinforcing elements or anchors (see Figure 3.1(D)).
- (e) *Limit Mode U5* Global failure mechanisms (see Figure 3(E)).
- (f) *Limit Mode U6* Bearing failure (see Figure 3.1(F)).

Inset 58: Section 3.2 of AS4678-2002

3.3 DESIGN CONSIDERATIONS FOR SERVICEABILITY LIMIT STATE

The design for serviceability limit state shall be adequate in that movement of the foundation, retaining wall, or reinforced soil structure does not cause local damage to the structure, which could shorten the structure's intended life or incur excessive maintenance costs. Possible deformation modes involving rotation, translation or bulging and settlement are shown, but not necessarily limited to, the following three serviceability limit state modes:

- (a) *Limit Mode S1* Rotation of the structure (see Figure 3.2(A)).
- (b) *Limit Mode S2* Translation or bulging of the retaining structure (see Figure 3.2(B)).
- (c) *Limit Mode S3* Settlement of the structure (see Figure 3.2(C)).

The concept of serviceability depends very much on the end use requirements of the structure. Normally, serviceability requirements for retaining structures are prescribed in terms of acceptable deformations. These limits will vary with the type of structure. In addition, the limits required will come into operation at different stages according to the type of structure.

NOTE: Deformations of reinforced soil structures are influenced as much by the construction process as by the design.

Post-construction deformations of the structure may be caused by, but not limited to, one or a combination of the following:

- (i) External ground movements (e.g. landslide).
- (ii) Foundation settlement.
- (iii) Creep extension of synthetic soil reinforcement.
- (iv) Creep movement of soil/reinforcement interface.
- (v) Consolidation of poorly compacted backfill.
- (vi) Displacement and deformation of the facing caused by the likes of construction equipment loading.
- (vii) Deterioration of the reinforcement due to metal corrosion or polymer degradation.

Where soils having significant shrink/swell characteristics are encountered at a site, then consideration of the effects of the shrink/swell movements shall be taken into account in the design of the structure.

Inset 59: Section 3.3 of AS4678-2002

3.6 DRAINAGE

3.6.1 General

Design of retaining structures shall consider the drainage aspects of the site, including the short- and long-term subsurface hydrological conditions of the site.

Drainage and the possible development of pore water pressure within a soil are amongst important considerations in the design of retaining structures because the presence of water behind an earth-retaining structure has a significant effect on the pressures applied to the structure. Even when there is no water in direct contact with the structure, increased pressures can occur on a retaining structure due to an elevated phreatic surface developed from water seepage into the failure wedge behind the structure.

NOTE: Additional information on drainage measures is given in Appendix G.

Inset 60: Section 3.6.1 of AS4678-2002

J11 EFFECTS OF WATER AND SEEPAGE

J11.1 General

Controlling hydrostatic pressures will often be the most important assumption in the design of a retaining structure. None of the following is sufficient to ensure that hydrostatic pressures will be adequately controlled throughout the design life of a structure:

- (a) Providing a 'drain' on a cross-sectional drawing.
- (b) Assuming or specifying that the backfill be 'free draining'.
- (c) Assuming that the wall itself is free draining.

If drains become ineffective, then the loads on a structure will increase substantially, and the resistances will reduce substantially, such that the overall safety of the structure will be halved.

Inset 61: Appendix J, Section 11.1 of AS4678-2002

7.5 Design Documentation

7.5.1 Geotechnical Advice and Site Conditions

123. I have not observed a Geotechnical Report that has been scoped for the 2022 or 2024 RWs. I note that the Civil Test report of 2015 (refer to paragraph [22]) did not provide RW advice, nor was it referenced in the "Proposed Structure" section of the report (refer to pdf page 1 of the CivilTest report (ref. 1150585 (3 December 2015)).
124. I have assumed the Rexicon have placed reliance on the CivilTest report 1222044-3 to design the RW outlined in Rexicon Drawings 23031-S00 to S04 (dated 1 June 2023).
125. I have not observed any boreholes or commentary explicitly related to the 2024 RW. I have not observed any direct evidence of consideration of the site conditions at the 2024 RW location, Inset 57.
126. It is my opinion that the scope of services in the Civiltest Report did not explicitly extend to the 2024 RW. Nonetheless, where a designer has relied on the advice in that report to design a RW, I would expect that they would interpret the following from that report:
 - (a) Allowance for wet soils between 1.8 m and 5.2 m below ground level as presented in Borehole 3 (Appendix C of the CivilTest report).
 - (b) Allowance for perched water at the interface between the Aeolian Sand formation and the granitic residual soil.
 - (c) Allowance for a stability analysis on the basis that CivilTest conducted repeat global stability checks in that report.
 - (d) "All piles should be founded not less than 7 m from the surface level" (Section 6.4 of the CivilTest Report).
 - (e) In my opinion where there was uncertainty in the CivilTest advice the designer should have contacted them for further advice, which is consistent with CivilTest recommendations, Inset 10.

127. I note that Rexicon were the designer for the proposed remediation of the 2022 Landslide.
128. Based on my experience in RW design and construction (refer to Great Ocean Roads and Inland Routes of my CV, Appendix B) it is my opinion that it is not general practice to design a RW in a deeply incised gully setting or steep slopes (refer to Wye River Landslide Assessments of my CV, Appendix B) without site specific geotechnical advice.

7.6 Serviceability Assessment

129. In my experience a serviceability assessment is typically completed as part of an engineered RW design that complies with AS 4678 (2002). This assessment would typically include a check of RW deflections. I have not observed evidence that this has been completed.
130. I have not completed a check of serviceability or deflections as the RW has failed and translated down the slope, and deflections are unacceptable.
131. I have assumed that the 2022 RW was replaced with the 2024 RW as it became unserviceable. That is, some form of failure occurred.

7.7 Ultimate Limit State Assessment

132. I have not observed any engineering calculations or stability analysis associated with the 2024 RW drawings provided for 10-12 View Point Road. In my opinion, if global stability was not considered, then the RW design is highly unlikely to be appropriate for the setting. In my opinion the 2024 RW drawings were:
 - (a) Not accurate, they do not have details of any tie backs and dead man anchors of the 2022 RW.
 - (b) Not built as the as measured details of the 2024 RW do not match the drawings, Inset 9.
133. I have observed engineering calculations and drawings associated with the 2022 Landslide (refer to paragraph [26]). I note that these drawings predated the 2024 RW. I have assumed that the following parties had awareness of those drawings and the supporting geotechnical analysis:
 - (a) MAW Civil.
 - (b) CivilTest.
 - (c) Rexicon.
 - (d) The Borghesi's.
134. I do not know who designed the 2022 or 2024 RW. I have assumed that MAW Civil constructed the 2024 RW (ref. paragraph [28]).
135. Based on my site observations of the 2022 and 2024 RW, Section 7.1 and my back analysis, Section 7.3 and Table 13 it is my opinion that the designer has not considered global stability of either the 2022 RW or the 2024 RW, Inset 58. In my opinion, both RW contribute to the increase in slope angle and without meaningful increase in resisting forces (from the piers of the RW).

7.8 Summary of Assessment

136. In my opinion the RW has not been designed in accordance with AS4678 (2002), the NCC (2019) or engineering first principles. In my opinion the design does not consider:
 - (a) The site conditions, refer to Cl. 3.1.1 of AS4678 (2002), Inset 57.
 - (b) Global stability, refer to Cl. 3.2 of AS4678 (2002), Inset 58.
 - (c) General serviceability and external movements from landslide, refer to Cl. 3.3 of AS4678 (2002), Inset 59.
 - (d) Effects of drainage and groundwater, refer to Cl. 3.6.1 and Appendix J of AS4678 (2002), Inset 60 and Inset 61 respectively.
 - (e) How to avoid causing damage to other properties, including 6 View Point Road, 3 Penny Lane and 607 Point Nepean Road, refer to Part 2.1.1 (a) iv of the NCC (2019), Inset 54.
 - (f) Structural actions from ground movement associated with landslide, refer to Part 2.1.1 of the NCC (2019), Inset 54.
 - (g) The requirements of AS4678 (2002), refer to Part 3.1.2 of the NCC (2019).

137. In my opinion, a reasonably competent professional engineer would consider these requirements in a RW design. Where they held the opinion that AS4678(2002) did not apply, in my opinion, first principles engineering design should apply. In my opinion where there was uncertainty, the designer should have sought advice from a registered geotechnical engineer experienced in retaining wall design in proximity to landslide hazards.
138. Based on my site observations of the 2022 and 2024 RW, Section 7.1 and my back analysis, Section 7.3 and Table 13, and the RW drawings (Paragraph [23]), it is my opinion that the designer has not considered global stability of either retaining wall, Inset 58.
139. In my opinion, if the 2022 and 2024 RWs were never built it is possible that the 2025 Landslides do not occur. This is supported by:
- (a) My observations of similar elevations of seepage in the gully and area of the 2022 Landslide between 2023 and 2025, Slide C27 of Appendix C. It is my opinion:
 - i. That elevated groundwater levels were a trigger of the 2025 Landslide.
 - ii. That there is a lack of evidence to suggest that groundwater levels had never been at the elevation observed in January 2025 and since the inferred placement of the OLD FILL in the 1970s.
 - (b) The likelihood that the mature trees removed around the headscarp of the 2025 Landslide were at minimum providing positive suction in the surficial soils.
 - (c) My back analysis in Section 7.3 which indicates that a FOS of greater than 1.1 for pre-construction slopes.
 - (d) Overall slope angles prior to construction of these RWs were in the order 32°. In my experience, these slope angles in uncontrolled fills are at best, temporarily stable especially where there is unfavourable basal geometry. Where the overall slope angle is increased to 37°, Inset 52, without any increase in effective resisting forces the FOS must decrease and the probability and consequence of failure increases significantly.
140. In my opinion, groundwater levels should be monitored over the longer term (months to years) to confirm the variation in the near surface groundwater table in the View Point Road area. Regardless of this requirement, the FOS for the as built 2024 RW is significantly less than 1.5 with no groundwater and in my opinion contributions to groundwater, although relevant to the trigger of the landslide, are of little consequence if a RW design is not appropriate for unsaturated conditions.

8. Groundwater Assessment

8.1 Overview

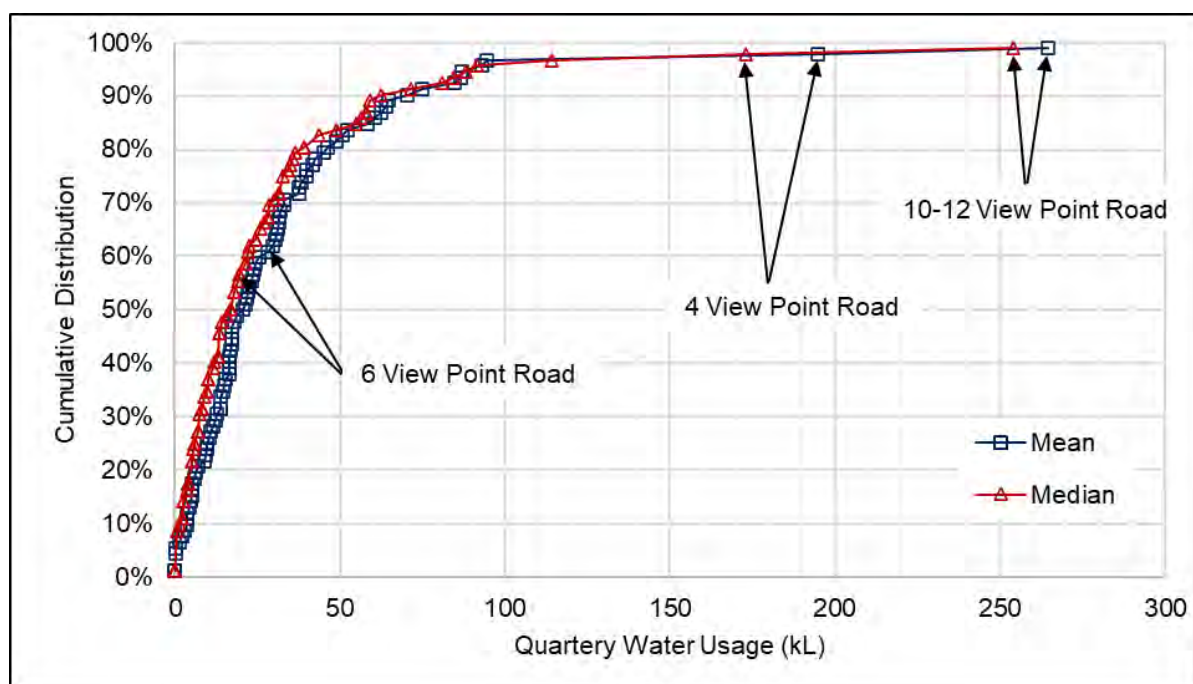
141. This groundwater assessment is not a hydrogeological assessment. It is a high-level assessment of contribution to groundwater from various sources.
142. I have considered:
- (a) My measurements of flows out to the 2025 Landslide location on 6 January 2025 and 16 June 2025.
 - (b) Irrigation from properties along View Point Road.
 - (c) Possible leakage from the View Point Road Stormwater System.
 - (d) Possible infiltration associated with the Browne Street Stormwater defect.
 - (e) Estimates by others of water losses associated with the Outlook Drive Water Main Failure.

8.2 Irrigation

143. I have reviewed water usage data of properties in the McCrae area between November 2021 and June 2025 (refer to Paragraph [42]). I note that SEW have inconsistencies in what is described as a “quarter”. For example, SEW measure water use from November to March which is clearly not a quarter of a year. Similarly SEW also reports June to August as a “quarter” which may be as little as two months depending on the start and end dates. I have assumed that a “quarter” is from the start of the first quoted month to the start of the second quoted month e.g. November to March “quarter” is from 1 November to 1 March, 120 days. I note that this assumption results in SEW year being made up of two, three months quarters, a four month period

and a two month period. For the sake of consistency, I refer to the four monitoring periods as “quarters” herein.

144. I have prepared cumulative distributions showing the average and median quarterly water usage, Inset 62.
145. I note that the median quarterly water usage at 10-12 View Point Road and 4 View Point Road are 254 kilolitres (kL) and 173 kL per quarter respectively. This is 15 and 10 times greater than the median property in the area respectively. In my opinion a significant proportion of infiltration could potentially reach the 2025 Landslide location due to:
- Vegetable gardens immediately behind the 2024 RW.
 - Deep sewer trenches on 4 View Point Road, Figure 4, that fall towards the southern boundary of 6 View Point Road.



Inset 62: Cumulative distribution of McCrae area water usage between November 2021 and June 2025

146. I have calculated the average water usage for the November to March “quarter” for 10-12 View Point Road and 4 View Point Road. I have excluded the November 2022 to March 2023 “quarter” at 10-12 View Point road as I understand that a private water line burst at the 2022 Landslide (and on the property) during this “quarter”. I have calculated:
- Average quarterly water usage of 403 kL at 10-12 View Point Road.
 - Average quarterly water usage of 243 kL at 4 View Point Road.
147. The exact number of days in each quarter is not clear to me. I have assumed that the November to March “quarter” is 120 days.
148. The SEW website states that “*On average, most of us use 161 litres [of water] a day*”. I assume this refers to personal water use, i.e. excludes irrigation. I have assumed that on average 2 persons reside in each dwelling.
149. I have assumed that the balance of daily water usage is associated with irrigation and have calculated the following typical daily irrigation volumes:
- 3358 litres per day at 10-12 View Point Road.
 - 2025 litres per day at 4 View Point Road.
150. The irrigated footprint of each property is not known to me. I have adopted the following two assumptions:
- Assumption 1: Irrigation is evenly distributed over the landscaped footprint of the property.
 - Assumption 2: Irrigation is concentrated on the plateau south of the escarpment crest (e.g. automatic irrigation is not undertaken on the steep northern slopes of the properties).

151. I have adopted an average net evapotranspiration of 2.8 L per m² per day based on net evapotranspiration for November to March reported at Rhyll weather station (station ID 086373).
152. I am of the opinion that it is plausible that irrigation south of the escarpment crest could contribute to groundwater recharge at the 2025 Landslide location.
153. Based on the assumptions and calculations in paragraph 146 to 152 I have calculated that irrigation at 10-12 View Point Road could contribute between 0 (Assumption 1) and 1200 litres per day (Assumption 2) to groundwater recharge at the 2025 Landslide location.
154. Based on the assumptions and calculations in paragraph 146 to 152 I have calculated that irrigation at 4 View Point Road is unlikely to be contributing significantly to groundwater recharge at the 2025 Landslide location.

8.3 Water Main Losses

155. Estimates by others of water losses associated with the Outlook Road Water Main Failure are summarised in Table 14.

Table 14 – Burst water main volume estimates by others

| Source | Leak Duration | Estimated Loss (ML) | Average daily leak (ML/day) |
|--|--|---------------------|-----------------------------|
| Lara Ohlsen Witness Statement, Section 3.6 | Leak stated to be from November to 31 December 2025. Assumed between 31 and 60 days | 37 | 0.6 to 1.6 |
| John Bolch Witness Statement, Section 3.6 | 38 to 60 days | 55 to 84 | 1.4 |
| Christofi Report, Section 3.6 | 60 days | 82 | 1.4 |

8.4 Stormwater Losses

8.4.1 Browne Street Stormwater Defect

156. In my opinion water losses through defects 8, 22 to 29, and 34, Figure 6, are not plausible to have contributed to groundwater conditions at 10-12 View Point Road.
157. In my opinion defects 1 and 4 are significant defects and may have promoted loss of water from the stormwater system. I note that these defects are at the location of the Browne Street Stormwater Defect.
158. In my opinion the remaining defects may have promoted some loss of water from the stormwater system however the losses are likely to be relatively small compared to the losses associated with defects 1 and 4.
159. In my opinion the Browne Street Stormwater Defect prior to remediation was likely to have permanent standing water associated with baseflows through the stormwater pipe. I estimate that the depth of water is likely to be in the order of 100 mm.
160. I note that the footprint of the void is approximately 4 m² (refer to paragraph 67) and that fill surrounding the stormwater pipe is a mix of High Plasticity Clay and Medium Plasticity Clay with Sand trace brick cobbles and boulders.
161. I note that based on published information for Clay and Clay Loam soils the likely infiltration rates for the fill are between approximately between 20 and 300 mm per day (paragraph [12]). These published values are consistent with my experience of infiltration rates of a compacted to nominally compacted clayey fill. I note that the upper limit is in my opinion an exceptional value in that it implies that 300 mm of rainfall could fall in a day uniformly in that area and all would infiltrate in a day.
162. I have calculated that infiltration through the void at Browne Street is between 75 and 1200 litres per day. In my opinion this is likely to have recharged groundwater.

8.4.2 View Point Road Stormwater System

163. The stormwater flow measurements presented in Table 8 and Table 9 indicate to me that:
- (a) Stormwater losses over a ~120 m length between 2 View Point Road and 10-12 View Point road are between 3% and 9%. Due to the variability between these two stormwater loss measurements I will confirm my opinion regarding stormwater losses following additional rounds of field measurements. I note that there is inherent uncertainty associated with manual measurement e.g. a reaction time of 0.5 seconds for a 10 second measurement can result in errors in the order of 5%.
 - (b) Stormwater base flows are in the order of 3 litres per minute or approximately 4300 litres per day.
164. In my opinion there are no significant defects in the stormwater system between 2 View Point Road and 10-12 View Point Road, Figure 6. I note a general lack of longitudinal fall on Prospect Hill Road/2 View Point Road.
165. In my opinion the percentage of stormwater loss may be higher under higher flows and this should be confirmed with field validation.
166. I have calculated, based on the measured baseflows and stormwater losses of between 3% and 9% between 130 and 390 L per day may have infiltrated the ground surrounding the stormwater pipe under base flow conditions. In my opinion this may have contributed to groundwater recharge at the landslide location.

8.5 Service Trenches

167. I have observed direct evidence of groundwater flowing in the backfill of service trenches in:
- (a) Test pits on Charlesworth Street.
 - (b) Seepage into the trunk stormwater main upstream of the MPF, Figure 5.
168. Based on engineering principles, single size bedding aggregate acts as a drainage layer. In my experience it is common to use as backfill in sub-surface cut off drains (also known as “french drains”) and drainage layers of RWs. If there is free water in the soils adjacent to this material it will most likely drain into this layer (with the exceptions being where the surrounding soils have higher permeability).
169. I have not quantified the volumes of water that could flow in this network in detail. I note that most of the service trenches in View Point Road follow topography. i.e. they fall downhill. The exceptions to this are the private surcharged stormwater systems and private sewer connections that connect to View Point Road trunk sewer.
170. Notwithstanding paragraph [169] I note that during dye testing in NDT04 my colleague Mr Oliver Stirzaker recorded that the water level dropped from 0.6 m above the top of the gravel pipe bedding layer to 0.3 m above the top of the pipe bedding layer over a period of 3 minutes. This equates to approximately 50 litres of water. This indicates to me that at relatively low heads (~0.5 m) flow through gravel bedding in sewer trenches may be in the order of 15 to 20 litres per minute or 21,600 to 28,800 litres per day. I note that this exceeds the flow rate measured from the 2025 Landslide on 6 January 2025. Where there is sustained flow in the backfill of the sewer, in my opinion a significant proportion of water in service trenches may have infiltrated into the COLLUVIUM immediately below the invert of the sewer trench on View Point Road, Figure 11.
171. The SEW trunk sewer on View Point Road is:
- (a) Approximately 6 m upstream of the proven flow path from NDT01 to the 2025 Landslide.
 - (b) Has gravels at the invert of the trench, refer to NDT04 borehole log.
 - (c) Has evidence of tree root systems at the invert of the trench, (refer to NDT04 borehole log), which is direct evidence of a source of water.
 - (d) Sits within the inferred COLLUVIUM layer, Figure 11.
172. The groundwater monitoring completed to date in the SEW or MPSC trenches on View Point Road has not captured evidence of piezometric pressures to date. It is well established that below average rainfall has been observed in 2025 (ref. Arthurs Seat weather station monthly statistical analysis, Inset 63). Further groundwater monitoring is required to established contributions from the backfill of service trenches.



Inset 63: Arthurs Seat (Station ID 586202) monthly statistical analysis

8.6 Groundwater – Shallow

173. I have discussed potential contributions to the Leaky Surficial Aquifer in Section 6.3 and paragraph [99].
174. In my opinion a detailed assessment of contributions to this aquifer by a hydrogeologist is warranted once more meaningful long term groundwater monitoring has been completed. Nonetheless, based on the proportion of volumes of water inferred to be available to recharge this aquifer in November and December 2024 and around June 2025, Table 15 it is my opinion that the major credible source of the volumes of water measured on 6 January 2025 is from the Outlook Drive Water Main Failure due to its capacity to recharge the Leaky Surficial Aquifer.
175. I have assumed the following:
 - (a) A 7 Ha drainage area, Inset 41.
 - (b) Typically the COLLUVIUM is SAND dominant and it is medium dense with a porosity of 0.4 and that the layer was dry (no water in the pore space).
176. In my opinion 28 ML of water would be required to saturate the bottom 1 m of COLLUVIUM between the two drainage paths shown in Inset 41.
177. I note that based on a 7Ha catchment area, 30 day antecedent rainfall to 5 January 2025 of 17 mm, and a 70% runoff coefficient the contribution of rainfall to groundwater is less than 0.4 megalitres. For comparison based on a 30 day antecedent rainfall to 16 June of 88 mm the contribution of rainfall to groundwater is approximately 1.8 megalitres.
178. I note that:
 - (a) The landform between Arthurs Seat and the escarpment is channelised. That is, there are numerous well defined drainage pathways, Inset 64.
 - (b) There is published evidence of buried compressible material in gully systems, refer to Inset 15 of the PSM LRA.
179. In my opinion it is possible that there are several buried paleochannels (i.e. a significant length of a stream channel which no longer conveys fluvial discharge) in the drainage area highlighted in Inset 41. In my opinion you would need much less water to recharge a localised and buried paleochannel. I have assumed:
 - (a) A continuous, 10 m to 20 m wide and buried shallow paleochannel. The widths are consistent with the local gully widths on the escarpment, refer to Inset 9 of the PSM LRA and Figure 2.
 - (b) That the paleochannel was backfilled with COLLUVIUM and ALLUVIAL soils.
 - (c) The bottom 1 m of COLLUVIUM infill in the channel is saturated.
 - (d) 90% of the lower bound Outlook Road Water Main Failure goes to stormwater and discharges to the bay.
 - (e) Properties as per Paragraph 175.
 - (f) A 500 m long channel.

180. In my opinion the volume of soil that is required to be saturated is 14% of the entire drainage path highlighted in Inset 41. It follows that approximately 5.4ML would be required to recharge a channel of this nature. In my opinion even where 70% of the SEW estimate of loss went to stormwater, Table 14, this still leaves 11.4 ML that could contribute to recharge of localised paleochannels. I consider that it is almost certain that these channels exist (paragraph [178]).

These lower plateau slopes represent the main flanks of the Dromana Granite intrusion. They have been eroded by several deeply incised drainage channels 10 to 15 m deep and 30 to 50 m wide that typically drain from Arthurs Seat north westward discharging at the coast, Inset 8. The exception to this is upslope of the Site where the main drainage channel from Arthurs Seat appears to have been significantly modified by both sub-division and the construction of the Mornington Peninsula Motorway. Consideration of older topographic maps from 1862 (PROV, 1862), 1920s (Keble, estimated 1920s) and 1965, Inset 3, all indicate that a defined drain or creek was present between what is now the Boulevard and Margaret Street. A trunk stormwater system is now in place which runs from the Boulevard to Margaret Street.

Inset 64: Excerpt from Section 4.1.1 of the PSM LRA

Table 15 – Groundwater contributions to leaky surficial aquifer – high level assessment

| Time Period | Contributing Factor | Contribution (L/day) | Comment | Measured Flow at Landslide (L per day) |
|-----------------------|--|----------------------|---|--|
| Around 16 June 2025 | 10-12 View Point Road Irrigation | 0 | Property not occupied or irrigated. | No less than 50 |
| | View Point Road stormwater base flows | 130 to 390 | Assumes all leakage discharges at landslide which is barely credible. Standpipes adjacent to View Point Road Stormwater System are dry at this time (Refer to PSM5665-070R) | |
| | Base flows through service trenches | 0 | VWPs in service trenches around View Point Road do not indicate presence of water. | |
| | Private surcharged stormwater systems | Unknown | 30 day antecedent rainfall of 88 mm at Arthurs Seat. | |
| | Burst water main | 0 | Assumed fixed approximately 6 months ago. | |
| | Rainfall / natural groundwater recharge. | Unknown | 30 day antecedent rainfall of 88 mm at Arthurs Seat. This corresponds to an estimated contribution to groundwater of about 1.8 megalitres (paragraph 177). | |
| Around 6 January 2025 | 10-12 View Point Road Irrigation | 0 to 1200 | Assumes all excess irrigation discharges to Landslide. | No less than 13000 to 17000 |
| | View Point Road stormwater base flows | 130 to 390 | Assumes all leakage discharges at landslide which is barely credible. May be higher due to higher “base flows” associated with water leak on 5 Prospect Hill Road. | |

| Time Period | Contributing Factor | Contribution (L/day) | Comment | Measured Flow at Landslide (L per day) |
|-------------|--|----------------------|---|--|
| | Flows through service trenches | Unknown | Likely to have been surcharged due to water from Outlook Road Water Main Failure. Water observed in sewer trenches on Charlesworth Street confirms mechanism. | |
| | Private surcharged stormwater systems | Negligible | 30 day antecedent rainfall of 17 mm at Arthurs Seat. | |
| | Outlook Road Water Main Failure | Unknown | <p>Daily burst volumes estimated to be between 0.6 ML and 1.6 ML/day (refer to Table 14). A proportion of burst volumes likely to have infiltrated into the COLLUVIUM with the majority of the balance discharged via stormwater.</p> <p>I note that the measured seepage out of the Landslide on 6 January 2025 is about 1% to 2% of the estimated daily burst volume.</p> | |
| | Rainfall / natural groundwater recharge. | Unknown | 30 day antecedent rainfall of 17 mm at Arthurs Seat. This corresponds to an estimated contribution to groundwater of less than 0.4 megalitres (paragraph 177). | |

Table 16 – Relative contributions to leaky surficial aquifer

| Contributing Factor | Discussion | Relative Contribution |
|--|--|-----------------------|
| Rainfall / natural groundwater recharge | <ul style="list-style-type: none"> Gully slopes in 2023 have wet soils in areas consistent with those observed in 2025 (C28 of Appendix C). Reports of inferred seepage from this gully onto 607 Point Nepean Road no later than 1987 (refer to Table 6). 30 day antecedent rainfall to 5 and 14 January of 17 and 37 mm respectively at Arthurs Seat. Measured seepage out of 2025 Landslide 50 L/day on 16 June 2025, Table 6. 30 day antecedent of 88 mm at Arthurs Seat (mean rainfall at Rosebud for May and June is 81mm and 78 mm respectively over a longer timeframe). This indicates to me that the primary source of groundwater observed flowing out on the landslide in January 2025 is unlikely to be groundwater associated with rainfall and “natural” groundwater conditions. | Minor to negligible. |
| Irrigation of properties along View Point Road | <ul style="list-style-type: none"> Extensive private irrigation systems in proximity to and across the escarpment. Two property owners on View Point road have the highest water use of up to 91 dwellings, Inset 62. Irrigation in excess of evapotranspiration can introduce water into the COLLUVIUM as well as the sewer trench backfill. The View Point Road sewer trench passes within 6 m of a proven flow path to the 2025 Landslide head, Figure 7 and Inset 34. Significant groundwater flows were observed in the days following the 14 January 2025 Landslide when all property owners from 2 to 22 View Point Road had been evacuated and water mains turned off to dwellings. This indicates to me that the primary source of the groundwater observed to be flowing out of the Landslide in January 2025 was unlikely to be due to local irrigation. | Minor to negligible. |
| Stormwater drain losses | <ul style="list-style-type: none"> Measured losses in the View Point Road stormwater system in the order of 130 to 390 L per day, Table 15. Defects elsewhere in the MPSC stormwater system could locally contribute to recharge the Leaky Surficial Aquifer including the Browne Street Defect, Section 8.4.1. The Browne Street defect may contribute up to 1200 litres per day due to the low permeability CLAY at that location. I note that the Browne Street defect is on the south western side of the gully shown in the 1957 survey, Inset 41 Seepage levels at the 2025 Landslide had reduced significantly well before the Browne Street defect was fixed in May 2025. This indicates to me that base flows leaving the Browne Street defect most likely provide minor contribution to the groundwater levels in the Leaky Surficial Aquifer. This is supported by the observations of significant stormwater flows in and around the present location. In my opinion losses from the View Point Road stormwater system and the broader McCrae stormwater drainage network did not materially contribute to base flows of the 2025 Landslides. This is supported by: | Minor to negligible. |

| Contributing Factor | Discussion | Relative Contribution |
|---------------------------------------|--|---|
| | <ul style="list-style-type: none"> - Multiple dye tracing events - The water chemistry of the 2025 Landslide water being notably different with regards to salinity and chlorides to that of the View Point Road stormwater system (refer to samples SW02 to SW05 of Appendix F of the PSM GFR) - That the flows persist to date as the water level in the 2025 Landslide decreases, Inset 46 and Inset 47 - Community reports that the Margaret Street drain had unusually notable flows in the absence of rain and damage around the pits and pipes suggesting significant flows (inside and outside of the pipe), Table 4. | |
| Private surcharged stormwater systems | <ul style="list-style-type: none"> • The 30 day antecedent rainfall to 16 June 2025 was 5 times higher than 6 January 2025 yet the measured flows out of the 2025 Landslide were two to three orders of magnitude lower. This indicates to me that it is barely credible that private surcharged stormwater systems meaningfully contributed to groundwater recharge of the leaky shallow aquifer around the time of the 2025 Landslides. | Negligible. |
| Trench backfill | <ul style="list-style-type: none"> • I note the following evidence of groundwater in service trenches: <ul style="list-style-type: none"> - Observations of groundwater in two test pits dug into the sewer trench of Charlesworth Street, Figure 5 and Photos 9 to 10 of Appendix D. - Evidence of seepage into the trunk stormwater line under the MPF, Section 8.5 and Figure 5. - Boreholes NDT10 and BH14A of PSM5665-070R. - Inferred collapse settlement above sewer trenches, Figure 5 and Appendix C27. • Due to the depth of the sewer in the proximity of Prospect Hill Road and View Point Road, Figure 3, these trenches are in my opinion likely to act as cut off drains for groundwater in the COLLUVIUM and the Leaky Surficial Aquifer. The base of these trenches can then traverse buried channels in the Residual Soils and XW Granite, promoting flow to the escarpment. • Standpipes and VWPs in the vicinity of View Point Road do not indicate the presence of water within service trenches. • For the above reasons it is my opinion that: <ul style="list-style-type: none"> - Infiltration and flow through trench backfill is unlikely to be meaningfully to groundwater recharge of the Leaky Surficial Aquifer under below average rainfall conditions and in the absence of significant anthropogenic water sources. - Service trenches may contribute significantly to groundwater recharge of the Leaky Surficial Aquifer when surcharged by significant anthropogenic water sources. - The contribution of service trenches under above average rainfall conditions should be assessed further. | <p>Minor to negligible under groundwater conditions corresponding to below average rainfall.</p> <p>Significant when surcharged by anthropogenic water source and potentially extensive during longer term above average rainfall</p> |

| Contributing Factor | Discussion | Relative Contribution |
|---------------------------------|--|-----------------------|
| Outlook Road Water Main Failure | <ul style="list-style-type: none"> The Outlook Road Water Main Failure may have contributed between 37 and 84 megalitres of water into the Leaky Surficial Aquifer and MPSC stormwater system (0.6 to 1.6 megalitres per day), Table 14. It is my opinion that the initial leak from the Water Main Failure could have flowed into the COLLUVIUM for a significant period of time and at least partially recharged the Leaky Surficial Aquifer before breach to the surface and the stormwater system. This is supported by: <ul style="list-style-type: none"> The period of at least 30 days post remediation of the Outlook Road Water Main Failure where Waller Place, Charlesworth Street and Prospect Hill Road and the 2025 Landslide headscarp all had strong evidence of elevated near surface groundwater. My simple void ratio calculations in paragraph 175, it would take 28 ML to saturate 1 m of COLLUVIUM over 7 Ha. In my opinion it is almost certain that water from the Outlook Road Water Main Failure flowed at least in part to the 2025 Landslides. My opinion is supported by: <ul style="list-style-type: none"> The drainage pathways of the plateau slopes, Inset 41, including those buried by the MPF. The interconnectivity of the deep sewer trenches and stormwater trenches, Figure 3. Observation of groundwater in the sewer trenches and backfill conducive to intercepting sub-surface groundwater flows. The short flow path between the View Point Road sewer trench and a proven flow path from NDT01 to the 2025 Landslide head, Figure 11. | Major |

8.7 Groundwater – Deep

181. I have discussed the deeper groundwater table and connectivity to overlying aquifers in Section 5.2 of the PSM LRA.
182. The elevation of this water table is consistent with published databases and is well below the observed seepage points of the 2025 Landslides. I have not observed direct evidence of excess pore pressure from this aquifer in the location of the 2022 or 2025 Landslides.
183. Leakage from the overlying aquifers will contribute to this deeper groundwater level however it is my opinion that the deep groundwater does not control slope stability at the location of the 2022 or 2025 Landslides.

9. 2022 Landslide

184. I provide details of my assessment of the 2022 Landslide in:
 - (a) Section 6.3.2.6 of the PSM LRA.
 - (b) The PSM 2022 Causation Report.
185. As part of my investigation into causation of the 2025 Landslides I have considered additional facts that in my opinion are relevant to causation of the 2022 Landslide. I note the following facts:
 - (a) On 10-12 View Point Road two ReIn Drains are still present in the northern lawn. These are at the locations of hand augers RD1 and RD2, Section 6.1.2 of the PSM GFR. These drains extend very close to the escarpment immediately behind the 2022 Landslide, Table 6. The drains have approximately a 400 mm diameter plastic arch with an open void underneath the arch, and above the arch is backfilled with gravels in the haunches of the arch. In my experience designing effluent fields for residential properties (refer to Wye River Landslide Assessments and Geelong Site Classification

- projects in my CV, Appendix B) this is typical of effluent disposal trenches. In my opinion these two trenches provide near surface cut off drains that would direct infiltration in the vicinity of the drains to the region associated with the 2022 Landslide. In my opinion these trenches provide a preferential flow path during periods of irrigation and wet weather and are a contributing factor to the 2022 Landslide.
- (b) Based on my extended review of aerial photographs from the 1970s, Section 6.3.3.2 of the PSM LRA, in my opinion it is possible a landslide occurred immediately east of the 2022 Landslide, Figure 2. The 2022 Landslide is immediately adjacent to the west. In my experience it is common for a landslide to initiate immediately adjacent to an existing landslide especially on linear slopes with similar ground conditions. In my opinion the presence of potential past landslide activity is a contributing factor to the 2022 Landslide.
 - (c) The irrigation at 10-12 View Point Road is inferred to be significant, refer Section 8.2. In the four months of November 2022 to the start of March 2023 the SEW water records indicate that 627 kL of water was used on the property. Based on the comparison between the same billing period in past and future years, it is possible that up to around 200 to 250 kL was lost during the failure of the private water line between 14 to 15 November 2022 and in the vicinity of the 2022 Landslide. This confirms my opinion that the debris flow event was most likely triggered by the private water line failure on 10-12 View Point Road.
 - (d) SEW reported a water main failure on 23 Coburn Avenue on 14 November 2022. I note that for the same reasons that water from the Browne Street Defect can contribute to recharge of the Leaky Surficial Aquifer in 2025 (and in 2022 if the defect present at that time), in my opinion water from the 23 Coburn Avenue water main failure could have contributed. The backfill of the Margaret Street drain at 23 Coburn Avenue is high plasticity CLAY (paragraph 33(e)). These materials have permeability orders of magnitude lower than the SILT/SAND dominant soils with boulders and cobbles observed in the COLLUVIUM. In my opinion this backfill would act as an inverted dam core and flows into that material would be significantly lower than into the surrounding COLLUVIUM near surface. It is unknown how long the water main was leaking and it is therefore difficult to meaningfully assess contribution to the 2022 Landslide.
 - (e) On this basis my assessment of contribution of causes in Section 8 and Table 3 of the PSM 2022 Causation Report is largely unchanged with the exception of:
 - i. There is further support that the slopes at the 2022 Landslide were marginally stable.
 - ii. There is further support of anthropogenic contributions from 10-12 View Point Road (i.e. the two Reln drains).
 - (f) My opinion on contribution from the cracked stormwater kerb as documented in the PSM 2022 Causation Report is unchanged.

10. Opinion

10.1 Overview

- 186. I have provided an overview of my opinion on physical elements of causation in Table 17. I have provided an overview of my opinion on planning, design and construction elements that have contributed to the 2025 Landslides in Table 18.
- 187. Where I can I have applied a relative contribution to the 2025 Landslide. Where there are outstanding assessments underway, I have provided those details. I provide justification of my assessment of relative contributions in the response to my questions of the Brief.

Table 17 – Overview of Causation – Physical elements

| Contributing factor | Detail | Data Sources | My opinion on relative contribution | Outstanding assessment |
|----------------------------|---|--|---|--|
| Filling over escarpment | OLD FILL , paragraph [89(c)] | <ul style="list-style-type: none"> Figures 11, 12, 14 Photos of headscarp from Appendix D Pointerra Reality Model Nearmap aerial imagery | <ul style="list-style-type: none"> Major (90% of FILL source material in 2025 Landslide) Major | <ul style="list-style-type: none"> Validate model on remediation of 2025 Landslide headscarp |
| | FILL-RW placed greater than 1 m above natural soil level, Inset 6 | <ul style="list-style-type: none"> Figures 11, 12, 14 Photos of headscarp from Appendix D Pointerra Reality Model | <ul style="list-style-type: none"> 10% of FILL source Major due to increase in slope angle (driving forces) | <ul style="list-style-type: none"> Validate model on remediation of 2025 Landslide headscarp |
| RW construction | 2022 RW on 10-12 View Point Road | <ul style="list-style-type: none"> Figure 11,12 Inset 52 | <ul style="list-style-type: none"> Major cause due to increase in slope angle (driving forces) | <ul style="list-style-type: none"> Consider drawings and design when produced Standard of care for professionals Involvement of retired civil/structural engineer |
| | 2024 RW on 10-12 View Point Road | <ul style="list-style-type: none"> Figure 11,12 Inset 52 Table 13 | <ul style="list-style-type: none"> Major cause due to increase in slope angle and poor design and construction | <ul style="list-style-type: none"> Standard of care for professionals Involvement of retired civil/structural engineer |
| Tree removal/heavy pruning | 10-12 View Point Road | <ul style="list-style-type: none"> Aerials/3D Nearmap, Appendix C | <ul style="list-style-type: none"> Moderate | <ul style="list-style-type: none"> Nil |
| Groundwater | Recharge of Leaky Surficial Aquifer | <ul style="list-style-type: none"> Table 16 | <ul style="list-style-type: none"> Primary Trigger | <ul style="list-style-type: none"> Long term groundwater monitoring in periods of above average rainfall |
| | Irrigation | | <ul style="list-style-type: none"> Nil to Minor | <ul style="list-style-type: none"> Nil |
| | Private surcharge stormwater systems | | <ul style="list-style-type: none"> Nil to minor | <ul style="list-style-type: none"> Long term groundwater monitoring in periods of above average rainfall |
| | Outlook Road Water Main Failure | | <ul style="list-style-type: none"> Major (primary source of recharge) | <ul style="list-style-type: none"> Consideration of hydrogeological studies |

| Contributing factor | Detail | Data Sources | My opinion on relative contribution | Outstanding assessment |
|---------------------|--------------------|--------------|--|---|
| | Stormwater losses | | <ul style="list-style-type: none"> Nil to Minor | <ul style="list-style-type: none"> Consider flow sensor data in high flows |
| | Service trenches | | <ul style="list-style-type: none"> Moderate | <ul style="list-style-type: none"> Long term groundwater monitoring in periods of above average rainfall |
| | Groundwater – deep | | <ul style="list-style-type: none"> Nil | <ul style="list-style-type: none"> Nil |

Table 18 – Overview of Causation – Planning, design and construction elements

| Contributing factor | Detail | Data Sources | My opinion on relative contribution | Outstanding assessment |
|----------------------------|---|---|---|--|
| Planning and approvals | Lack of Erosion Management Overlay (EMO) DDO available, Inset 6 MPSC LRA and Peer Review process known to property owner of 10-12 View Point Road prior to construction | <ul style="list-style-type: none"> Susceptibility study, Inset 1 DDO, Inset 6 Planning documents for similar developments (e.g. 597 Point Nepean Road, 14-16 View Point Road), Table 5 | <ul style="list-style-type: none"> Minor to negligible MPSC systems in place to trigger landslide risk assessment for planning/building permits. | <ul style="list-style-type: none"> Confirm if 2 m high RW and filling up to 2 m above natural soils would trigger a building permit |
| Geotechnical investigation | No targeted investigation for either 2022 or 2024 RW Old fill not captured by CivilTest 2015 soil test (paragraph [22]) and RW not in scope. | <ul style="list-style-type: none"> Refer to sources from Table 17 | <ul style="list-style-type: none"> Major contribution due to lack of site specific information . i.e lack of information to inform “Site Conditions”, Inset 57 | <ul style="list-style-type: none"> Confirmation that specific investigation was completed. |
| Design | As measured from Pointerra Reality Model | <ul style="list-style-type: none"> No drawings available | <ul style="list-style-type: none"> Major contribution, Section 7.8 | <ul style="list-style-type: none"> Confirm formal drawings Confirm the Designer for 2022 and 2024 RWs |
| Construction | MAW Civil built the 2024 RW, Inset 12 | <ul style="list-style-type: none"> Photographic evidence, Inset 12 Pointerra Reality Model | <ul style="list-style-type: none"> Major contribution, Section 7.8 | <ul style="list-style-type: none"> Confirm building permit Details of tie backs and dead man piers Builder of 2022 RW |

10.2 Question 1

“What were the trigger/s of the landslides which occurred on 5 January 2025 and 14 January 2025?”

10.2.1 Opinion

188. It is my opinion that the trigger and a physical cause of the 2025 Landslides is elevated groundwater levels. I provide my summary of contribution of various sources to the near surface groundwater at the 2025 Landslide, Table 17. It is my opinion that the major contributing factor to the elevated groundwater was anthropogenic. In the absence of any other credible source of water to recharge the Leaky Surficial Aquifer, it is my opinion that, on the balance of probabilities, the dominant source of recharge was that of the Outlook Road Water Main Failure. I provide justification of this as follows:
- (a) Contributions to groundwater recharge in Table 15 and Section 8.
 - (b) Visual observations during 2025, Appendix D and Figure 5.
189. Although there are likely several other contributing sources to the recharge of the Leaky Surficial Aquifer, over the longer term I observed the decrease in seepage levels, Inset 46 and Inset 47 and flow rates (ref. paragraph [103]) at the 2025 Landslide. Noting that there has been below average rainfall in 2025, these observations indicate to me that the contributions from irrigation, rainfall, stormwater drain losses from joints or defects, losses from private surcharged stormwater systems and trench backfill do not meaningfully contribute to the flow rate from the 2025 Landslide. These trends should be confirmed with long term groundwater monitoring as the proportion may change with above average rainfall over extended periods of time (i.e. months of wet weather).

10.3 Question 2

“If the trigger/s was/were not the cause, what was the cause?”

10.3.1 Opinion

10.3.1.1 Physical Causation

190. It is my opinion that there are several physical causes of the 2025 Landslides. These include:
- (a) Groundwater - Refer to my response to Question 1.
 - (b) A fundamental cause of the 2025 Landslides was the placement of the OLD FILL onto a steep basal geometry of the original gully slopes. The OLD FILL represents approximately 90% of the total landslide mass based on my volumes in Table 10. The OLD FILL by its heterogeneous nature and the placement methodology is fundamentally unstable. That is, at some stage in its life it would be expected to fail in this manner once appropriate triggers occurred. In my opinion, if the OLD FILL was not placed into the gully, the 2025 Landslides do not occur.
 - (c) Recent filling and the construction of the 2024 RW that fundamentally increased the driving forces in the slope at 10-12 View Point Road without effectively providing resisting forces in the form of an appropriate socket of the piers into XW Granite. The 2024 and 2022 RWs have the effect of increasing the slope angle from 32 ° to 37 °, Inset 52, and without addition of effective resisting forces. The planter boxes and elevated vegetable garden beds add further surcharge to the slope. I note that the 2024 RW does not extend across the OLD FILL slope and therefore there is a significant surcharge added to the slope and insufficient retaining wall width to support the development.
 - (d) My back analysis indicates that the slopes pre-RW construction were marginally stable with FOS in the order of 1.1 to 1.3. I am not aware of any reported landslides in the gully associated with the 2025 Landslides prior to this event. This fill may have been placed approximately 50 years ago (Appendix C9 to C10 and Table 6) and has been exposed to multiple significant rainfall events, refer to Section 5.1 of the PSM LRA. Nonetheless, in my experience it only takes a relatively minor change in conditions to trigger failure of a fill slope of this age. This is supported by my experience in the Otway Ranges remediating sideling fill slopes of similar age (refer to Great Ocean Road and inland routes projects in my CV in Appendix B) where bushfire or torrential rain (or both) trigger failures decades after the roads were widened or re-aligned. In the 2025 Landslide scenario, a 10% increase in total fill volume, a 5 ° increase in overall slope angle, Inset 52, and the increase in groundwater levels in my opinion is enough to destabilise the slope.

10.3.1.2 Design, Construction, Planning Causation

191. It is my opinion that there are several design and construction causes of the 2025 Landslides, Table 18. In my opinion the contribution is split evenly between design and construction with negligible to minor contribution due to the lack of an EMO. In my opinion it is almost certain that all identifiable parties involved in the 2024 RW design and construction had familiarity with the MPSC design expectations on the escarpment from direct involvement in the 2022 Landslide matter. Furthermore, the DDO requirements, Inset 6, in my opinion, have a series of requirements associated with structures near the escarpment.
192. In my opinion it is the responsibility of the professional completing a Site Classification to AS2870 (1996 or 2011) to identify that a site could be a "Problem Site" due to landslide. This is my direct experience in completing Site Classifications in areas that do and do not have landslide overlays (refer to Geelong Site Classification projects of my CV, Appendix B). This reinforces my opinion that there is negligible to minor contribution from the presence of an Erosion Management Overlay or not in the context of the 2025 Landslides and the requirements for dwellings in the context of AS2870 (1996 or 2011) and the NCC, Inset 54. Furthermore, it is my opinion that the CivilTest Site Classification for 10-12 View Point Road is confusing because it states that development should be kept outside of a zone that is 5 m from the escarpment and yet states that the gully area is stable, Inset 7. In my opinion, at an absolute minimum the designer, contractor and property owner should have sought clarification prior to completing design and construction of the 2022 or 2024 RW.
193. In my opinion it is unusual for a civil or structural engineer (practising or not) to have involvement in the design of RWs on one steep slope of a property, conduct or commission an engineering assessment for that RW, and then not apply similar engineering principles to another section of the slope with 32 to 45° slopes, Figure 10.
194. I have considered the soil test reports for all three dwellings in close proximity to the landslide (3 Penny Lane, 10-12 View Point Road garage, 6 View Point Road). I note that:
 - (a) All soil test reports were written after the Thredbo Landslide which occurred on the 30 July 1997.
 - (b) The Thredbo landslide occurred in soils of granitic origin.
 - (c) It is my understanding of literature available and the direct experience of my senior peers throughout my career that Thredbo was a major event in Australia and in particular the Geotechnical Engineering community.
 - (d) All soil tests identify that the site geology for the respective soil test reports was Devonian Granites.
195. I note that AS2870 (1996) Residential slabs and footings- construction:
 - (a) States in Cl. 2.1.1 – "Site classification may require consideration of factors beyond the boundaries of the subject site.", Inset 65.
 - (b) Provides General definitions of Site Class and which includes provisions to classify a site as Problem Site due to landslide/landslip, Inset 66.
 - (c) States that sites shall be classified as Class P if the sites are subject to landslip, Inset 67.
 - (d) Supplement 1 to AS2870 (1996):
 - i. Indicates that it is "important for the problem sites to be correctly identified as in some cases they can appear to be similar to stable sites", Inset 68.
 - ii. Provides guidance on treatment of sloping sites, Inset 69.
 - iii. Provides guidance on design for landslip, Inset 70.
196. I note that AS2870 (2011) Residential slabs and footings has similar provisions however is more specific in the context of what is required when a site is classified as "Class P", Inset 71.
197. In Section 5.3 of the PSM LRA I discuss the frequency of water main failures in the SEW database available at that time and in the public domain. I note that the average age of the pipes when a defect is registered is 50 years. I note that:
 - (a) The Outlook Road water main is registered in the SEW Asset Map system as being PVC and built in 1965 (refer to Section 0) and is 60 years old. Furthermore, the AC pipe connected upstream of the reported failure was built in 1963 and is 62 years old.
 - (b) The View Point road water main is registered in the SEW Asset Map system as being AC pipe built in 1958 (refer to Section 3.5) and is 67 years old.

198. The Outlook Road Water Main Failure occurred in PVC pipe. In my opinion it is well established in the public domain (publications, newspaper articles, websites, etc) that water main failures can contribute to landslides ([Thredbo landslide, 1997 | Australian Disasters](#), accessed July 2025). It is my opinion that there is a significant amount of ageing AC pipeline in the McCrae community immediately upslope of the escarpment (refer to SEW Asset Management GIS and Section 0) and that SEW has awareness of the risk of an increase in failures in the coming years, Inset 24. It is my opinion that this network should be risk assessed and reviewed in its capacity to trigger landslide events. I note that the same principles apply to private residents who have water main connections that extend across the escarpment and downslope to their dwellings. i.e. in my opinion there is a hazard presented by private water main connections that traverse the escarpment. This is supported by the observations on 10-12 View Point Road during the 2022 Landslide event (refer to my PSM 2022 Causation Report and Section 9).

2.1 GENERAL

2.1.1 Classification

Site classification is performed to allow the selection of standard footing designs presented in Section 3 or for the design of footing systems by engineering principles as described in Section 4.

Natural sites shall be classified into one of the classes given below in accordance with Clauses 2.2, 2.3 and 2.4 for both the expected extent of soil movement and the depth to which this movement extends. In the classification account shall be given to the possibility of a Class P site caused by conditions described in Clause 1.3.3(a), (b) or (c). For the effects of fill on classification see Clause 2.4.6.

NOTE: Site classification may require consideration of factors beyond the boundaries of the subject site.

Inset 65: Excerpt from Cl. 2.1 of AS2870 (1996)

| TABLE 2.1 GENERAL DEFINITIONS OF SITE CLASSES | |
|--|---|
| Class | Foundation |
| A | Most sand and rock sites with little or no ground movement from moisture changes |
| S | Slightly reactive clay sites* with only slight ground movement from moisture changes |
| M | Moderately reactive clay or silt sites, which can experience moderate ground movement from moisture changes |
| H | Highly reactive clay sites, which can experience high ground movement from moisture changes |
| E | Extremely reactive sites, which can experience extreme ground movement from moisture changes |
| A to P | Filled sites (See Clause 2.4.6) |
| P | Sites which include soft soils, such as soft clay or silt or loose sands; landslip; mine subsidence; collapsing soils; soils subject to erosion; reactive sites subject to abnormal moisture conditions or sites which cannot be classified otherwise |

* For examples of clay sites classified as Class S, refer to Appendix D.

Inset 66: Excerpt from Table 2.1 of AS2870 (2011)

2.4.4 Class P sites

Sites shall be classified as Class P if—

- (a) the allowable bearing pressure is less than specified in Clause 2.3.5;
- (b) excessive foundation settlement may occur due to the effects of fill loading on the foundation;
- (c) the sites contain uncontrolled fill or certain controlled clay fill as stipulated in Clause 2.4.6;
- (d) the sites are subject to mine subsidence, landslip, collapse activity or coastal erosion; or
- (e) the sites are subject to moisture changes due to extreme site conditions significantly more severe than the reasonable site conditions described in Clause 1.3.2.

Inset 67: Excerpt from Cl. 2.4.4 of AS2870 (1996)

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AS 2870 Suppl— 1996

C2.4.4 Class P Sites Certain sites may become Class P sites for the reasons listed in the Clause.

Sites with unusual foundation problems such as mine subsidence, uncontrolled fill, landslip conditions or soft soil are classified as problem sites and will require a footing design by a qualified engineer. It is important for the problem sites to be correctly identified as in some cases they can appear to be similar to stable sites. For example, collapsing soils have a high bearing capacity when dry, but a much lower bearing pressure when wet, and hence need to be classified as a soft foundation.

Inset 68: Excerpt from C2.4.4 AS2870 (1996) supplement

C6.4.4 Treatment of sloping sites Most sites include some slope and although it is convenient to illustrate the prescribed designs for flat sites, often modifications for sloping sites will be needed. For moderate slopes the edge beam can generally be deepened and a very deep edge rebate can be used. For steeper slopes controlled fill past the edge of the slab may be useful. Footing slabs are particularly relevant for sloping sites, and with an appropriate retaining wall can accommodate significant differences in level. The compaction of the fill behind the wall needs to be carefully carried out or the wall may be damaged. Since a 100 mm thick slab can span up to a distance of 1 m, moderate compaction may be accepted for only the first metre inside the perimeter wall for a depth of fill up to 1 m. For depths of fill over 1 m, complete compaction is required and temporary propping of the wall during compaction may be necessary unless proved otherwise by engineering design.

For very steep sites the slab may need steps to accommodate the change in level.

Many of the details such as steps and edge retaining walls have an influence on stiffened raft performance, and care should be taken on reactive sites. For example, the beams must be structurally continuous through the step and where retaining walls are introduced, the slab and footing should be tied together.

For steep slopes, the effect of cut and fill on the possibility of landslip should be considered.

Inset 69: Excerpt from C6.4.4 AS2870 (1996) supplement

C7.6 DESIGN FOR LANDSLIP Sloping sites where landslip is suspected should be assessed, a footing system designed, and appropriate land management procedures applied (see Ref. 1).

REFERENCE

- 1 WALKER B., DALE E., FELL R., JEFFERY R., LEVENTHAL A., McMAHON M., MOSTYN G., AND PHILLIPS A. 'Geotechnical Risks Associated with Hillside Development', *Australian Geomechanics News*, No. 10, December, 1985, pp 29–35.

Inset 70: Excerpt from C7.6 AS2870 (1996) supplement

2.1.3 Classification of other sites

Sites with inadequate bearing strength or where ground movement may be significantly affected by factors other than reactive soil movements due to normal moisture conditions shall be classified as **Class P**. **Class P** sites include soft or unstable foundations such as soft clay or silt or loose sands, landslide, mine subsidence, collapsing soils and soils subject to erosion, reactive sites subject to abnormal moisture conditions and sites that cannot be classified in accordance with Clause 2.1.2.

A site shall be classified as Class P if—

- (a) the bearing strength is less than that specified in Clause 2.4.5;
- (b) excessive foundation settlement may occur due to loading on the foundation;
- (c) the site contains uncontrolled or controlled fill as identified in Clause 2.5.3;
- (d) the sites may be subject to mine subsidence, landslide, collapse activity or coastal erosion;
- (e) the site may be subject to moisture changes due to site conditions more severe than the normal site conditions described in Clause 1.3.2; or
- (f) the site may be subject to other factors resulting in foundation movement beyond the reactive soil movements resulting from moisture changes due to the normal site conditions described in Clause 1.3.2.

The basis for classification shall be recorded on the site classification report together with recommendations for further geotechnical investigation.

Inset 71: Excerpt from Cl. 2.1.3 of AS2870 (2011)

199. In my opinion none of the developments are classified correctly to AS2870 (1996) or in more recent times AS2870 (2011). In my opinion they all should have been classified as “Class P” and with the correct reason clearly provided (due to landslide) consistent with the normative and informative requirements of AS2870 (1996) and (2011). It is my opinion that further investigation would have been warranted, and which should have included a Landslide Risk Assessment. In my opinion, geotechnical risks associated with hillside development had clearly been established by the time of all of these Site Classifications, Inset 70.
200. I note that CivilTest do not discuss landslide risks on 3 Penny Lane. The site classification of “CLASS P” is not supported by a clear reason and in my opinion is incorrect.
201. CivilTest present landslide risks for 10-12 View Point Road, Inset 7, and classify the Site as “Class M”. In my opinion the Site Classification should have been “CLASS P” due to landslide and abnormal moisture conditions for the trees that were proposed to be removed to build the garage (Slide 20 of Appendix C).
202. I note that the original 3 Penny Lane was built decades prior to Thredbo and AS2870 (1996). I note that AS 2870 was first issued in 1986 and with a draft in 1985. Nonetheless, it is my opinion that the site should have been classified as “CLASS P” due to landslide even for the proposed extension.
203. I note that the CE Lawrence & Associates report 02/0555 (30 April 2002) does not classify the site as “CLASS P” due to landslide. It is my opinion that the correct site classification is “CLASS P” due to landslide. There is advice regarding design for proximity to the escarpment, Inset 21. I further note that on the E-struct structural engineering drawings there is evidence of piles being designed with some consideration of an offset to the escarpment. I have not observed any specific geotechnical design or analysis for lateral loads to those piles for landslide or commentary on the possibility and extent of landslide regression.
204. In my opinion it is reasonable for all professionals providing site classifications at the time of these reports to understand the risks associated with hillside development and classify these sites as “CLASS P” due to landslide so that appropriate investigations and design can be completed.

10.4 Question 3

“If there is not one cause or the cause is not certain, then provide the likelihood/s of cause”

10.4.1 Opinion

205. Refer to my responses to Question 1 and Question 2.
206. The proportions of contributions to the groundwater levels at the 2025 Landslides is complex and I have not completed my investigations. Ongoing groundwater monitoring is required to develop an understanding of the variability of groundwater levels in proximity to the 2025 Landslide. My preliminary view is that multiple factors are likely to have contributed to the groundwater levels at the time of the 2025 Landslides.

207. I have considered various sources of water that may have contributed to the groundwater conditions in proximity to the 2025 Landslide based on the information available to me at this time. My opinions as to the contribution of each of these sources is provided in Table 17. In my opinion the major contributing factor to be water associated with the Outlook Road Water Main Failure.
208. I provide my opinion on contribution in Question 2 and in Table 17 for physical causes and Table 18 for planning, design and construction purposes. It is important to note the role of the professionals completing the Site Classification to AS2870 for all dwellings associated with the 2025 Landslides. That is, in my opinion, none of them correctly classify the sites and this contributes to the vulnerability of the dwellings to landslides.

10.5 Question 4

“With regards to the 2022 landslide:

- a. Was there a causal relationship between the 2022 landslides and the 2025 landslides?*

If the remediation works proposed after the 2022 landslides had been carried out, would this have changed the likelihood of the 2025 landslides?”

10.5.1 Opinion

209. Although seepage from the gully region is common to both landslides, there was no design intent for permanent sub-surface drainage to be installed as part of the 2022 Landslide rectification. This is because drains require ongoing maintenance and therefore it was proposed to design a solution that could tolerate long term groundwater pressures and saturation of the near surface COLLUVIUM.
210. In my opinion, rectification of the 2022 Landslide would not have extended into the gully beneath the 2025 Landslide because:
- Fundamentally the landslides are in different slope settings. Refer to Section 6.2.2 of the PSM LRA. In my opinion the proposed rectification design would not have been appropriate as it was not designed for the ground conditions associated with the 2025 Landslides. For example, it is difficult to install nails and mesh through an existing post and panel retaining wall and the proposed soil nails are unlikely to have been an appropriate length. In my opinion, where this hazard was part of the scope of works, an entirely different method of rectification would have been considered. This would most likely have involved demolition of the retaining wall and removal of the fill and some other form of major engineering works to mitigate the natural gully and the proximity of structures to the gully.
 - If the remediation works proposed after the 2022 landslides had been carried out, in my opinion this would not have changed the likelihood of the 2025 landslides. Although groundwater is common to both the 2022 and 2025 Landslide sites, in my opinion, the recent filling and construction of the RW was a primary cause of the 2025 landslide. Refer to my response to Questions 2 and 3.
 - I have assumed that all parties associated with the 2024 RW had awareness of the MPSC expectations of geotechnical and structural design in areas of the escarpment (refer to all documents associated with my 2022 Causation Brief). I have assumed that all parties were actively working through this process for the 2022 Landslide and constructed the 2024 RW concurrently.
 - I have assumed that MAW Civil were familiar with the 2022 Landslide remediation proposed by the Borghesi's, Inset 11, and that they proceeded with construction of the 2024 RW, Inset 12. In my opinion it is reasonable to expect an experienced contractor who is familiar with Local Government and residential construction to at the very least, enquire about the differences in designs proposed for the 2022 Landslide and the 2024 RW. For example, the landscaped walls proposed in paragraph [29] had 1.5:1 socket to retained height ratio. Some of the piers for the 2024 RW were measured to have a 0.8 to 0.9:1 socket to retained height ratio, Appendix H, which in my opinion and experience in the design and construction of dozens of similar walls (Refer to my landslide remediation experience in my CV, Appendix B) is often fundamentally unstable where there is no socket into bedrock (or XW Granite in this setting) in a hillside setting with a 32° slope immediately below the RW.
 - The property owners had received geotechnical advice from CivilTest regarding offsets for development within 5 metres of the escarpment for the garage, Inset 7. As a minimum I would expect this to be provided to the retaining wall designer and that the designer would then identify that there is no RW specific information and that there may be issues with development on escarpment.

- (f) I note that at some point in time Rexicon was the designer of both proposed 2022 landslide remediation RW and the 2024 RW, albeit the 2024 RW drawings are “For review” only. It is my opinion that the Rexicon design for the 2024 RW was not built. I am not aware of the designer for the as constructed 2024 RW or if there was a formal design.

Yours Sincerely

Personal Information

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PRINCIPAL**

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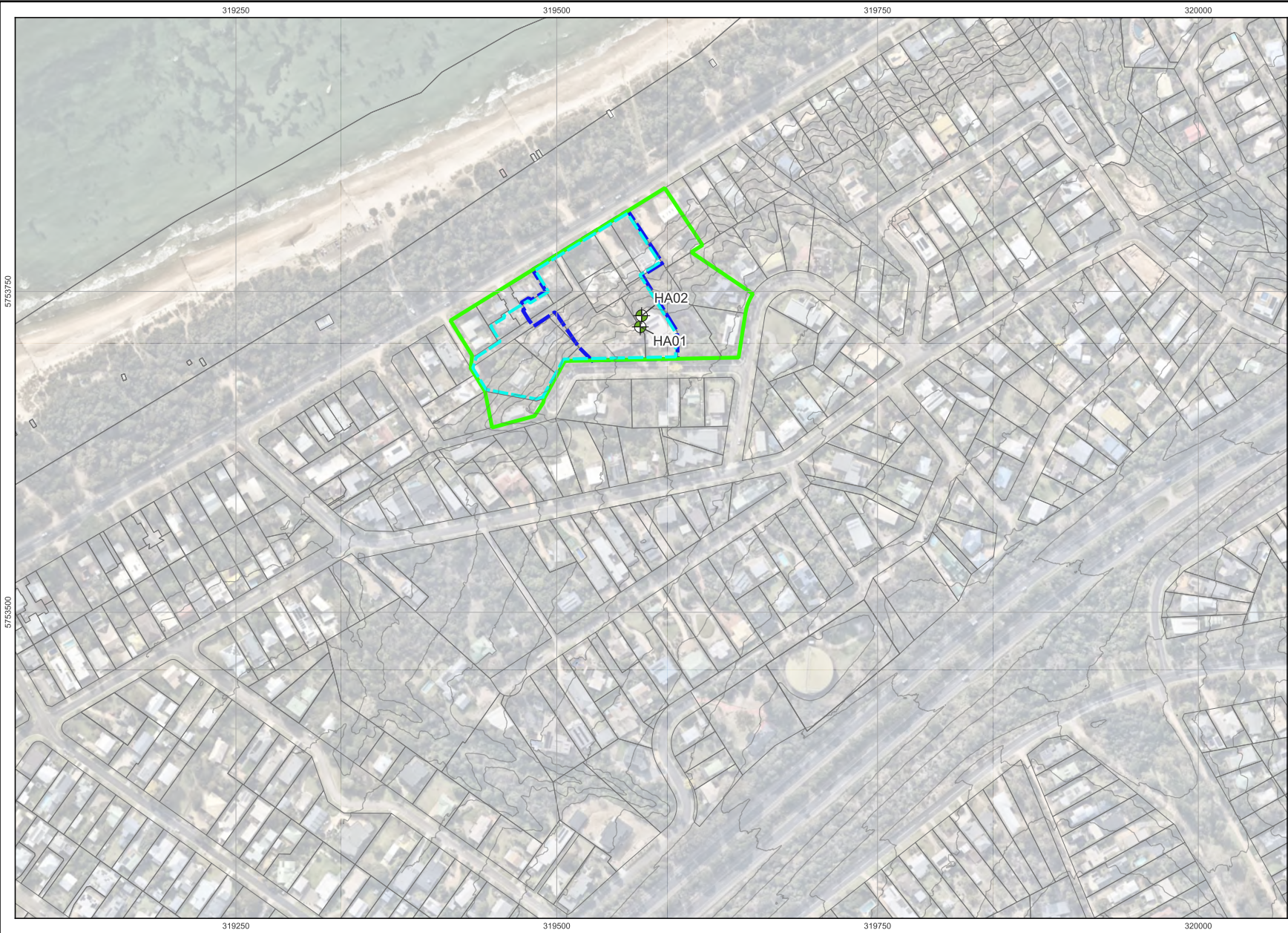
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Level 3 22 Delhi Street
West Perth WA 6005
+61 8 9462 8400





- Legend**
- February 2025 LiDAR (Diospatial)
 - Cadastral
 - Extent of Properties Evacuated (17/01/2025)
 - Extent of Properties Evacuated (14/02/2025)
 - Extent of Properties Evacuated (20/02/2025)
 - Hand Augers

NOTES:
1. Aerial imagery taken on 04 May 2025 from Nearmaps.

N

0 20 40 60 80 100 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

PSM

Created By: NM

Date: 21 Jul 2025

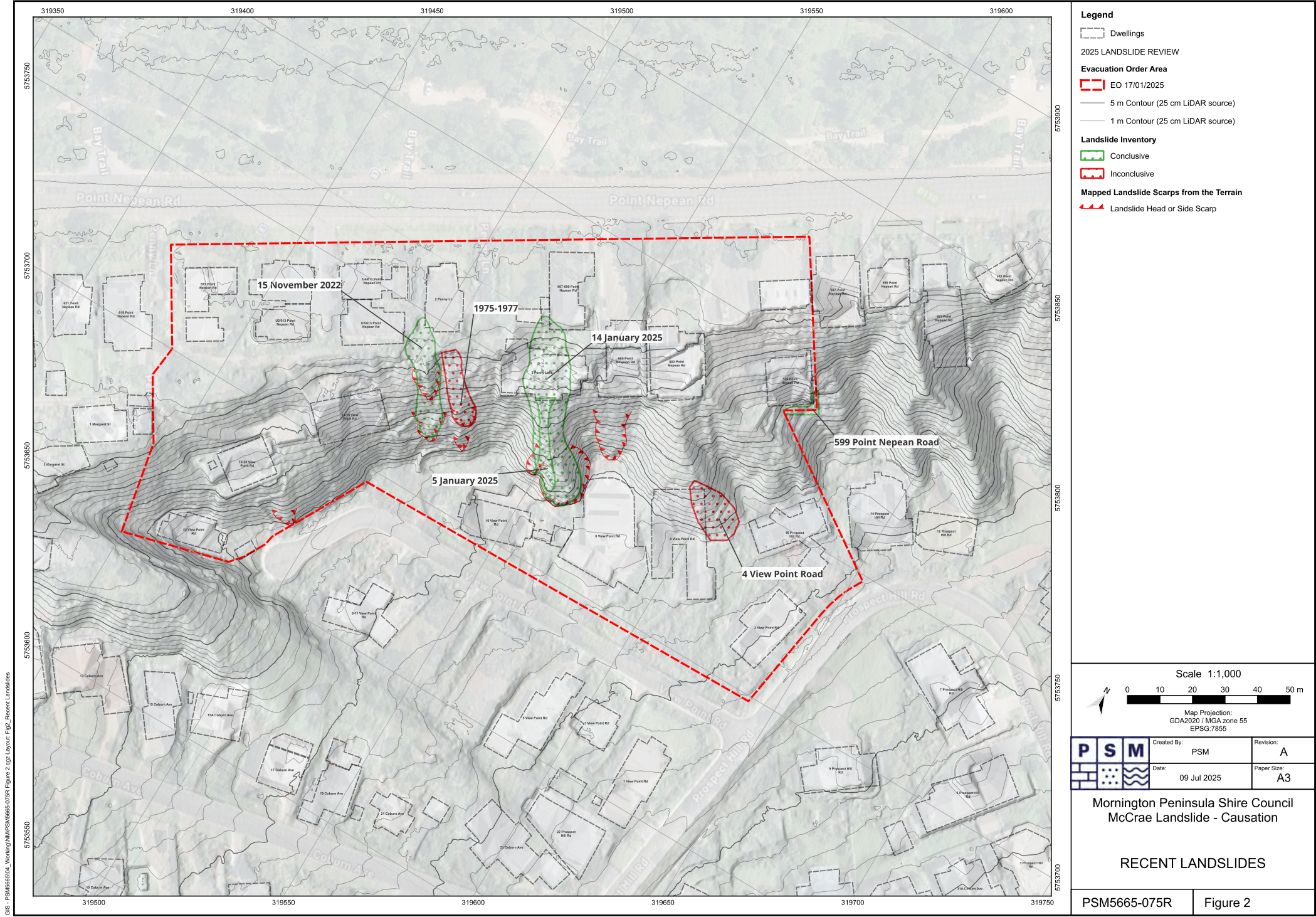
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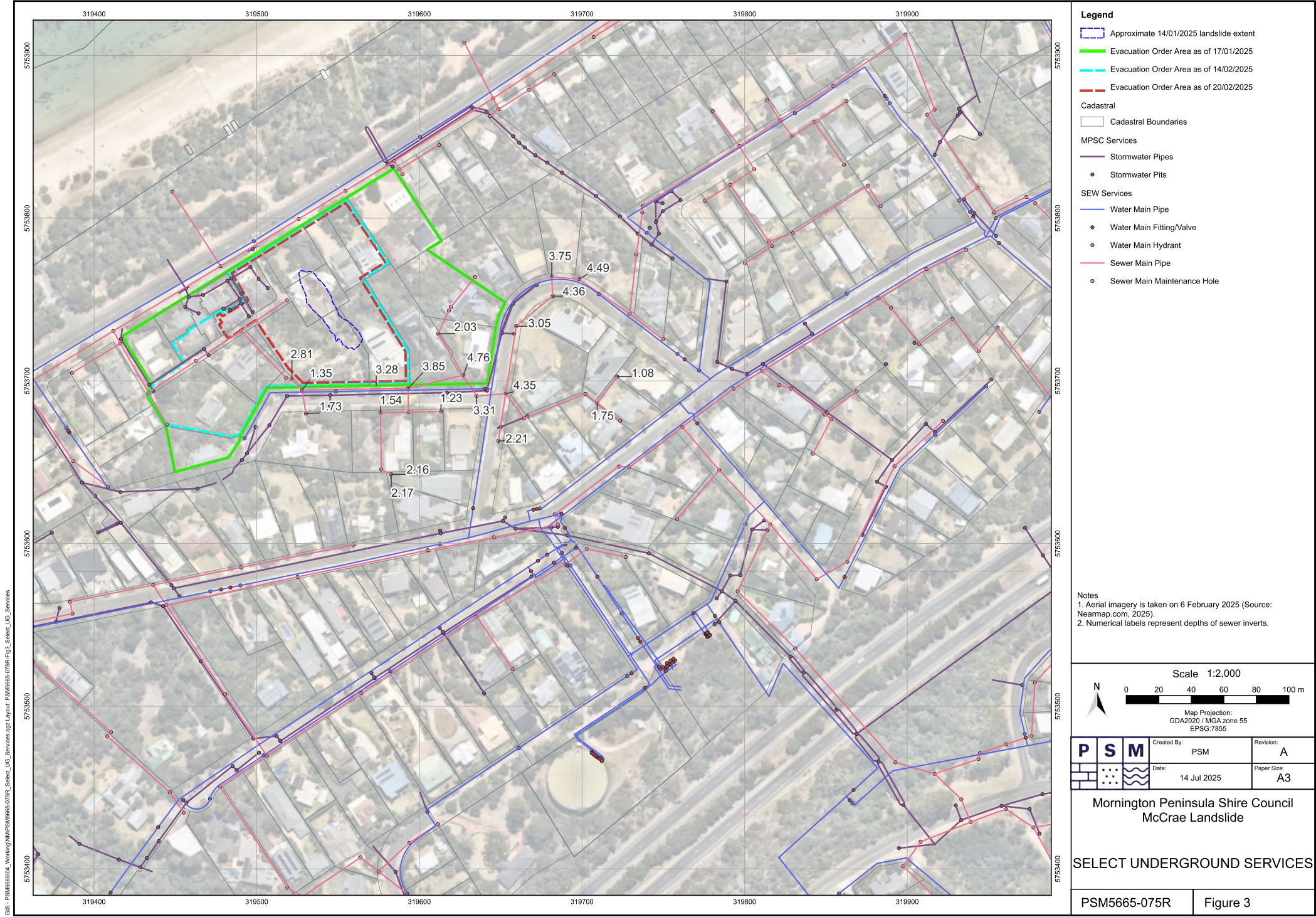
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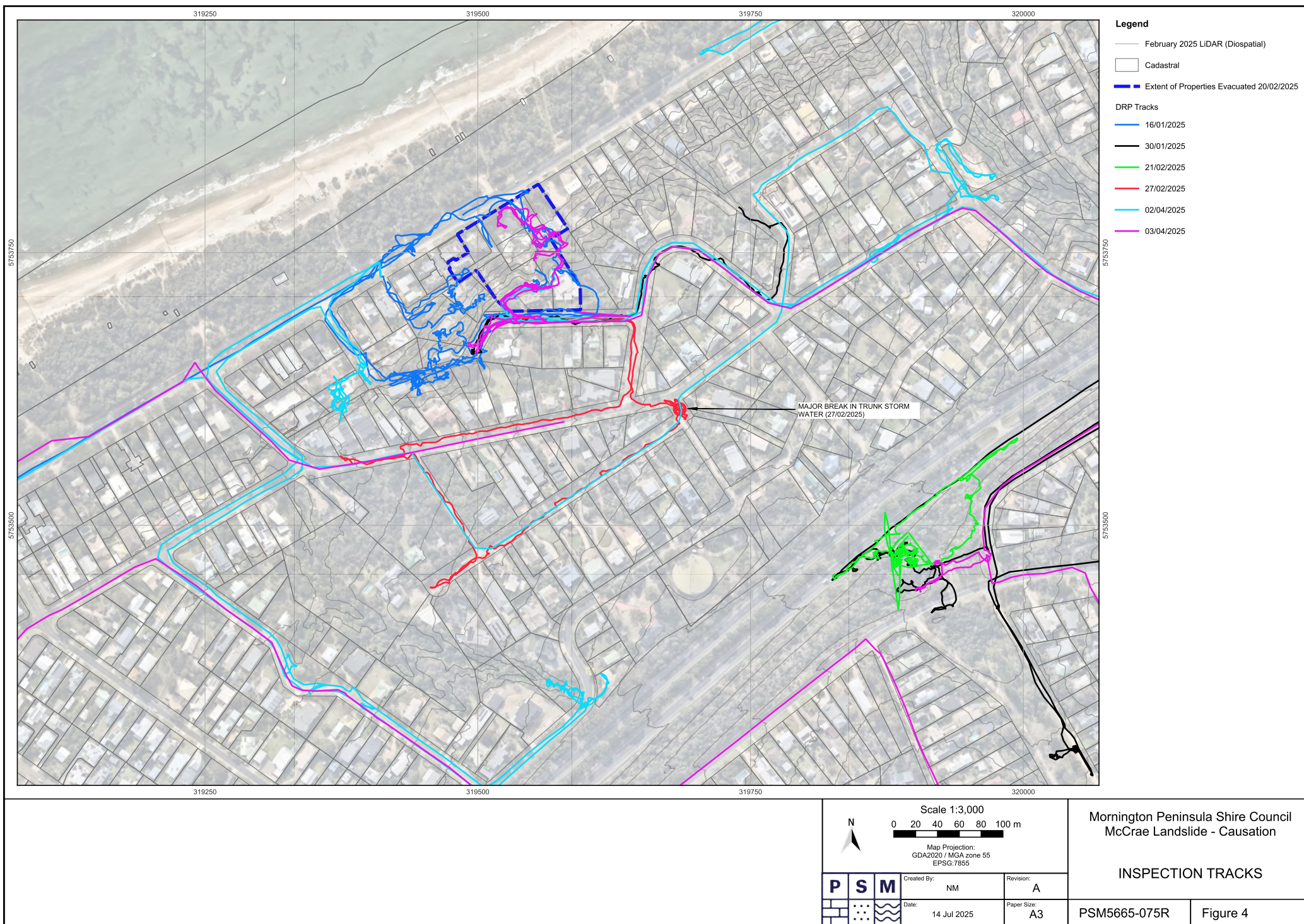
Mornington Peninsula Shire Council
McCrae Landslide - Causation

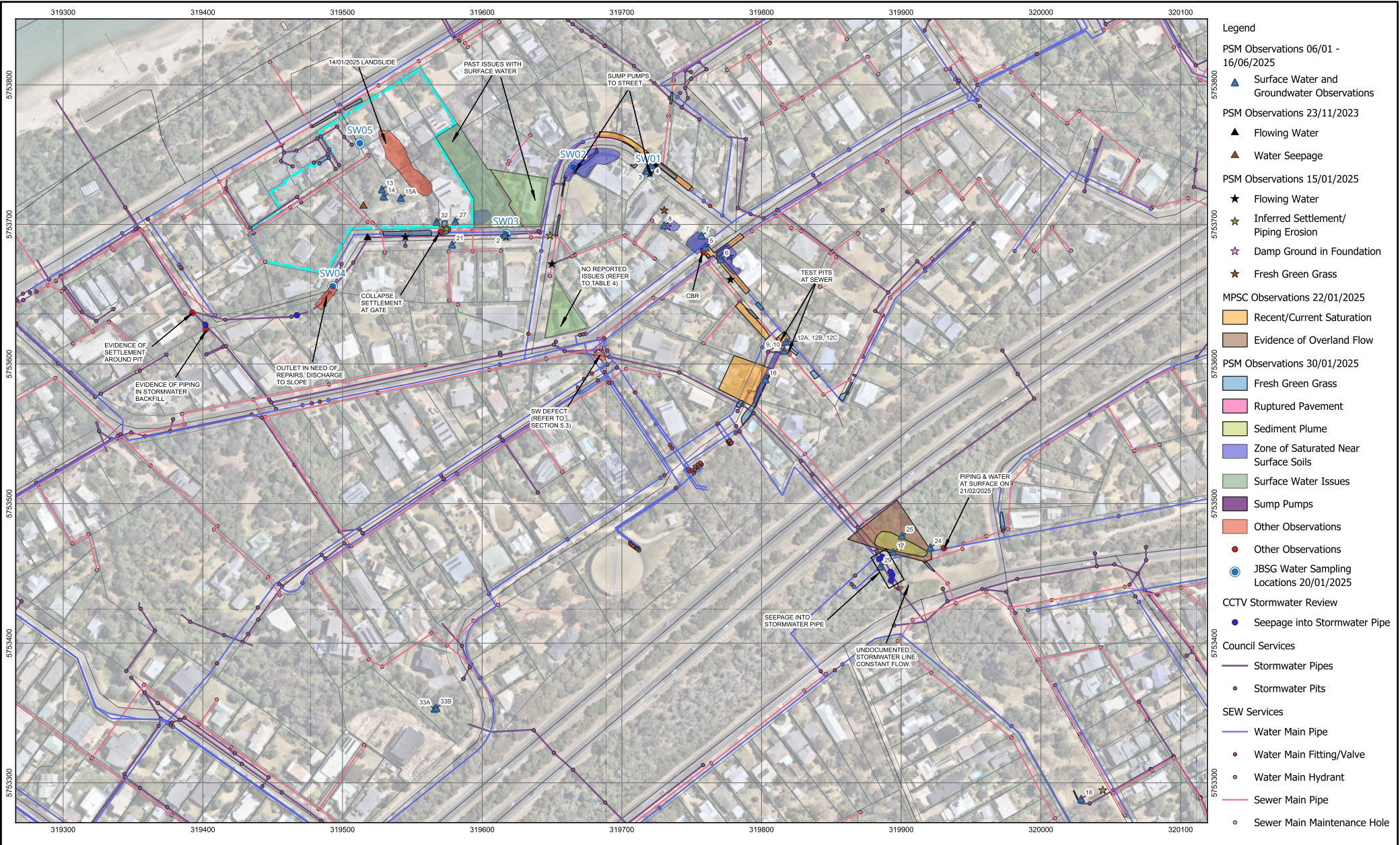
SITE PLAN

PSM5665-075R Figure 1









NOTES:
1. Aerial imagery taken on 18 January 2025 from Nearthmaps.

Legend (cont.)

Cadastral

- Cadastral Boundaries
- Road Network - Vicmap Transport

Scale 1:2,500

0 50 100 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

Created By: PSM

Date: 14 Jul 2025

Revision: A

Paper Size: A3

Mornington Peninsula Shire Council
McCrae Landslide - Causation

**SURFACE WATER AND
GROUNDWATER OBSERVATIONS**

PSM5665-075R

FIGURE 5



- Legend**
- Landslide**
- Approximate 14 January 2025 Landslide Extent
- Cadastral**
- Cadastral Boundaries
- Council Assets**
- Stormwater Pipes
 - Stormwater Pits
- Stormwater Inspection**
- CCTV Inspected Lengths
 - Undocumented Stormwater Line
 - Approximate Pipe Extent
 - Cavity Extents
- Selected Defects**
- Longitudinal Displacement - Soil Visible
 - Longitudinal Displacement - Void Visible
 - Angular Displacement - Soil Visible
 - Radial Displacement - Soil Visible
 - Radial Displacement - Void Visible
 - Radial Displacement - Soil / Void Visible
 - Localised Hole - Soil Visible
 - Localised Hole - Void Visible
 - Localised Hole Soil / Void Visible
 - Circumferential Cracking - Soil Visible
 - Circumferential Cracking - Void Visible
 - Blockage

NOTES:

1. Aerial imagery taken on 04 May 2025 from Nearmap.

2. Basemap overlay is OpenStreetMap (CC-BY-SA): <https://www.openstreetmap.org>

3. Numerical labels represent Defect ID.

Scale 1:2,000

0 20 40 60 80 100 m

Grid: EPSG:7855

P S M

Created By: JN

Date: 14 Jul 2025

Revision: A

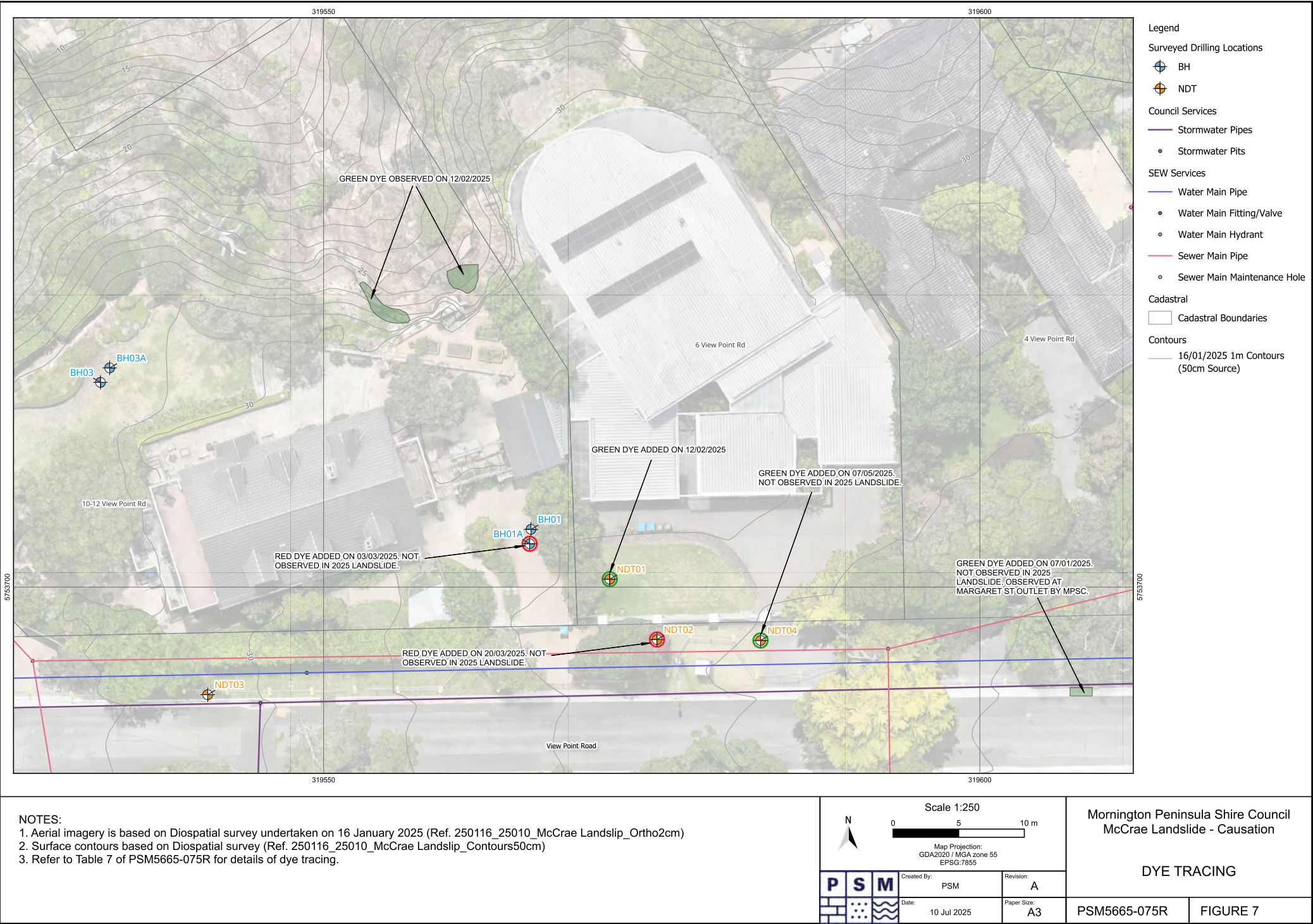
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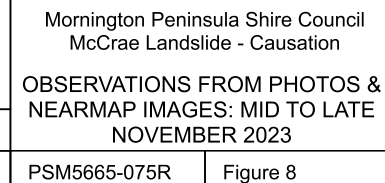
Mornington Peninsula Shire Council
McCrae Landslide

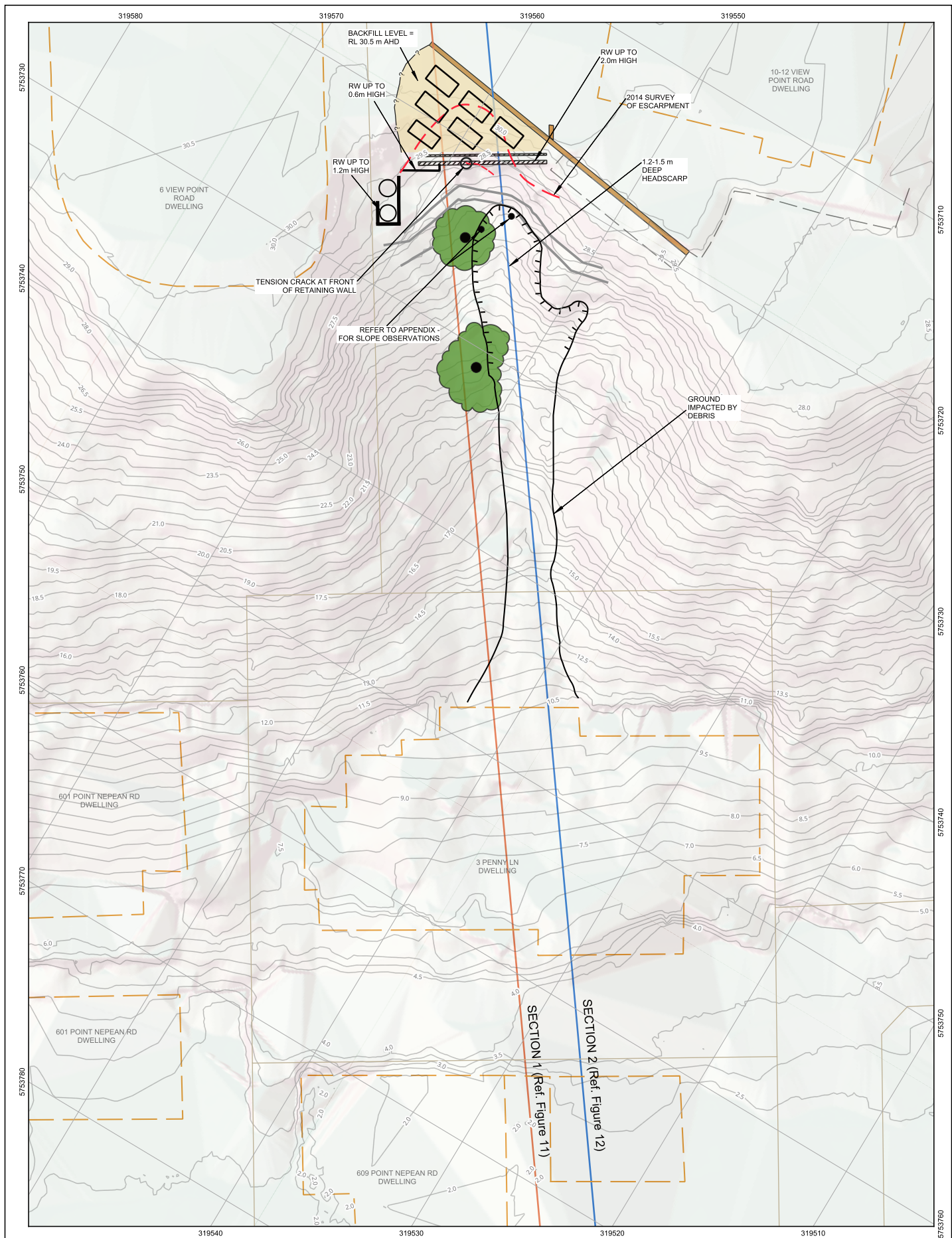
**CAUSATION
STORMWATER DEFECTS**

PSM5665-075R

FIGURE 6







Legend

- 0.5m Contour Lines (2019 LIDAR)
- Cadastral Boundaries
- Landslide Head Scarp

Scale 1:200

0 1 2 3 4 5 6 7 8 9 10 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855



Created By: PSM

Date: 08 Jul 2025

Revision: A

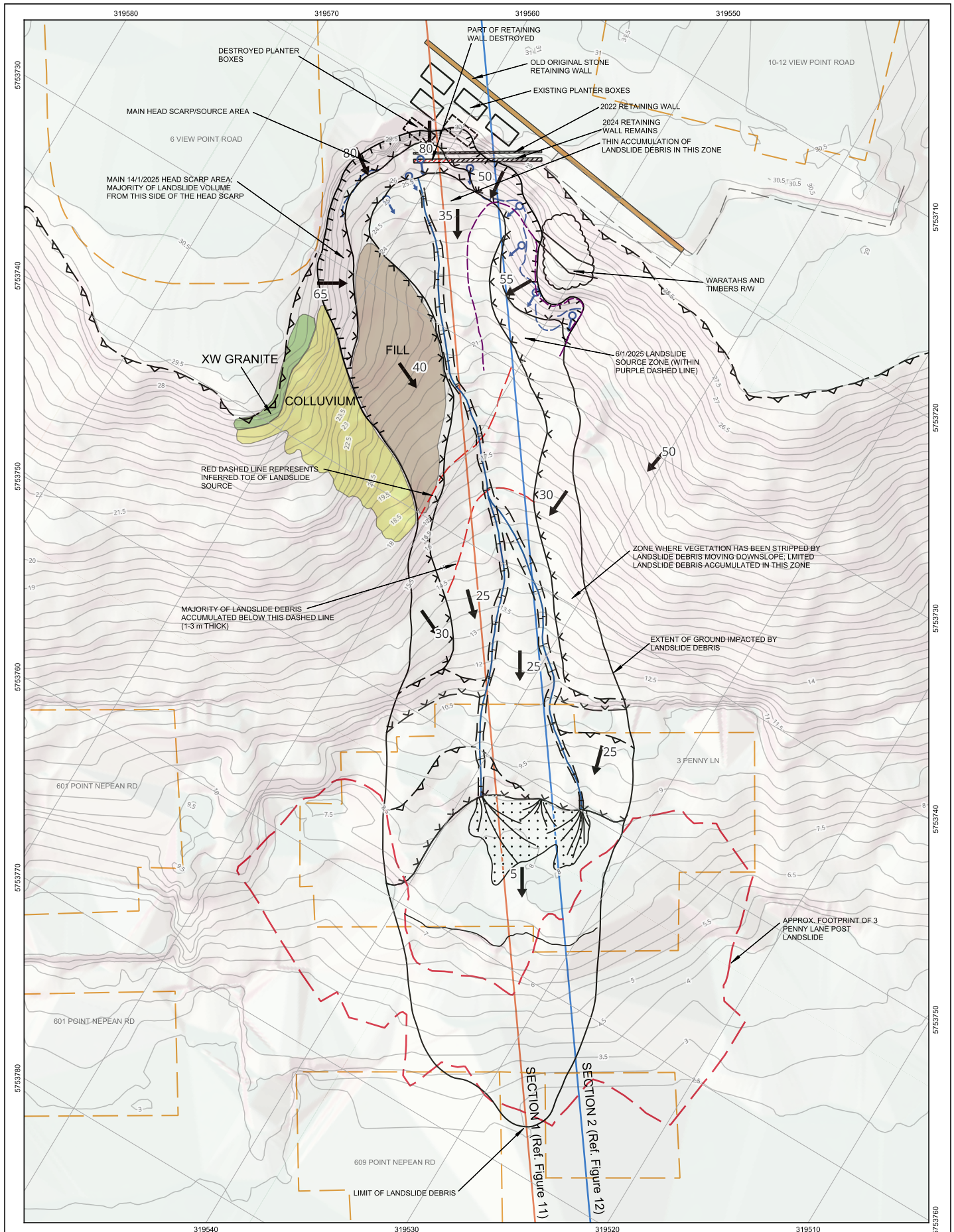
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Mornington Peninsula Shire Council
McCrae Landslide - Causation

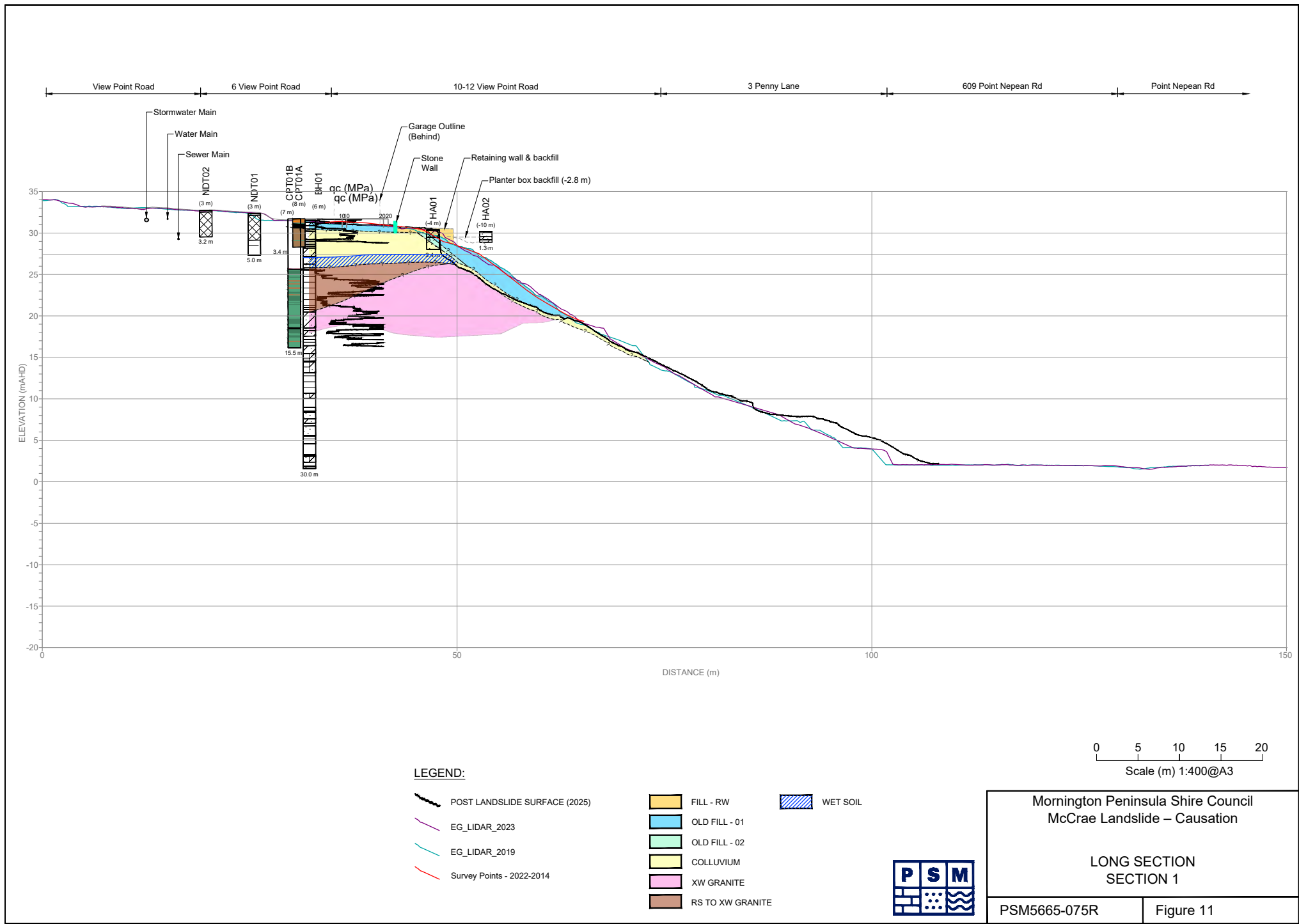
06/01/2025 LANDSLIDE CHARACTERISTICS

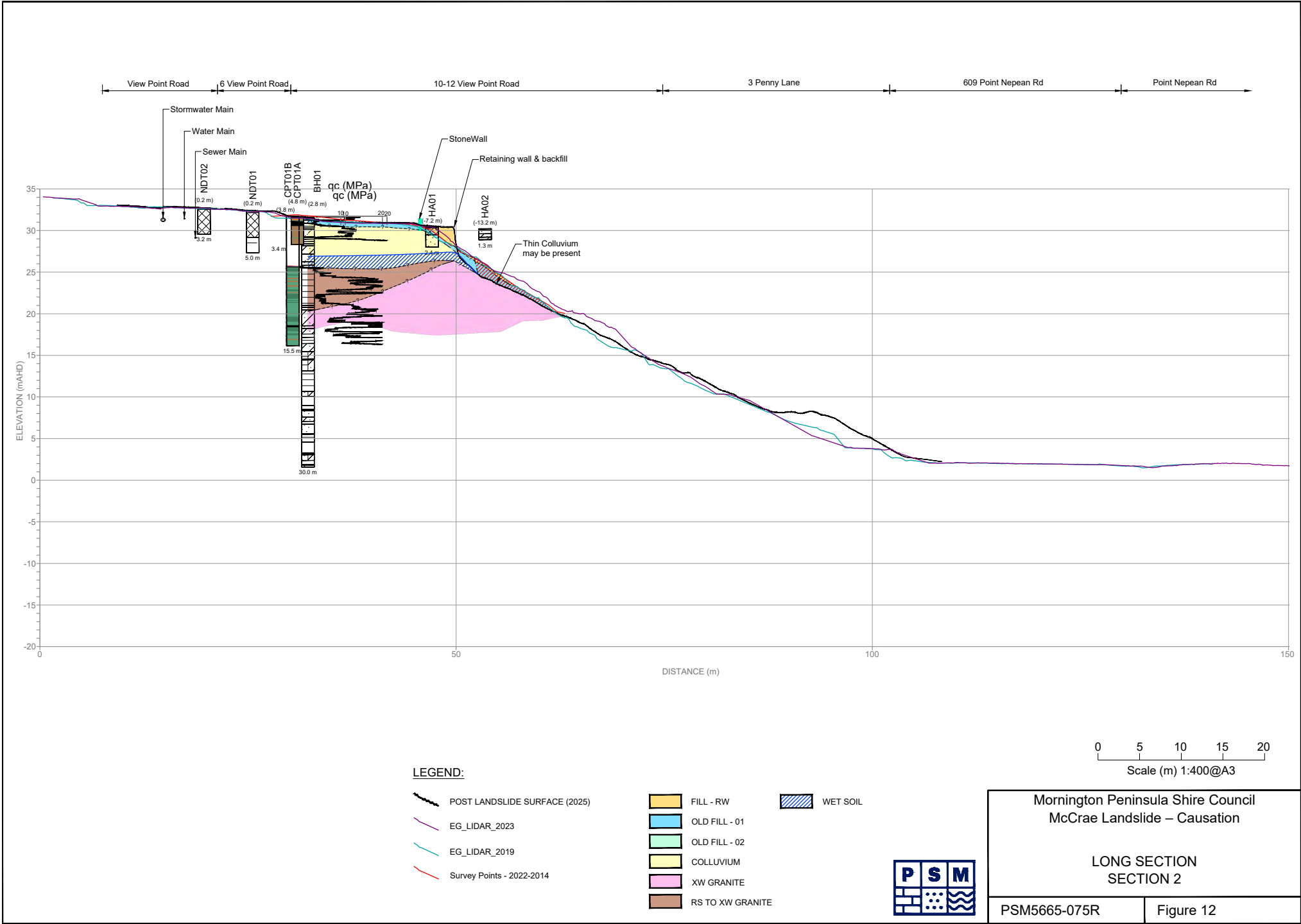
PSM5665

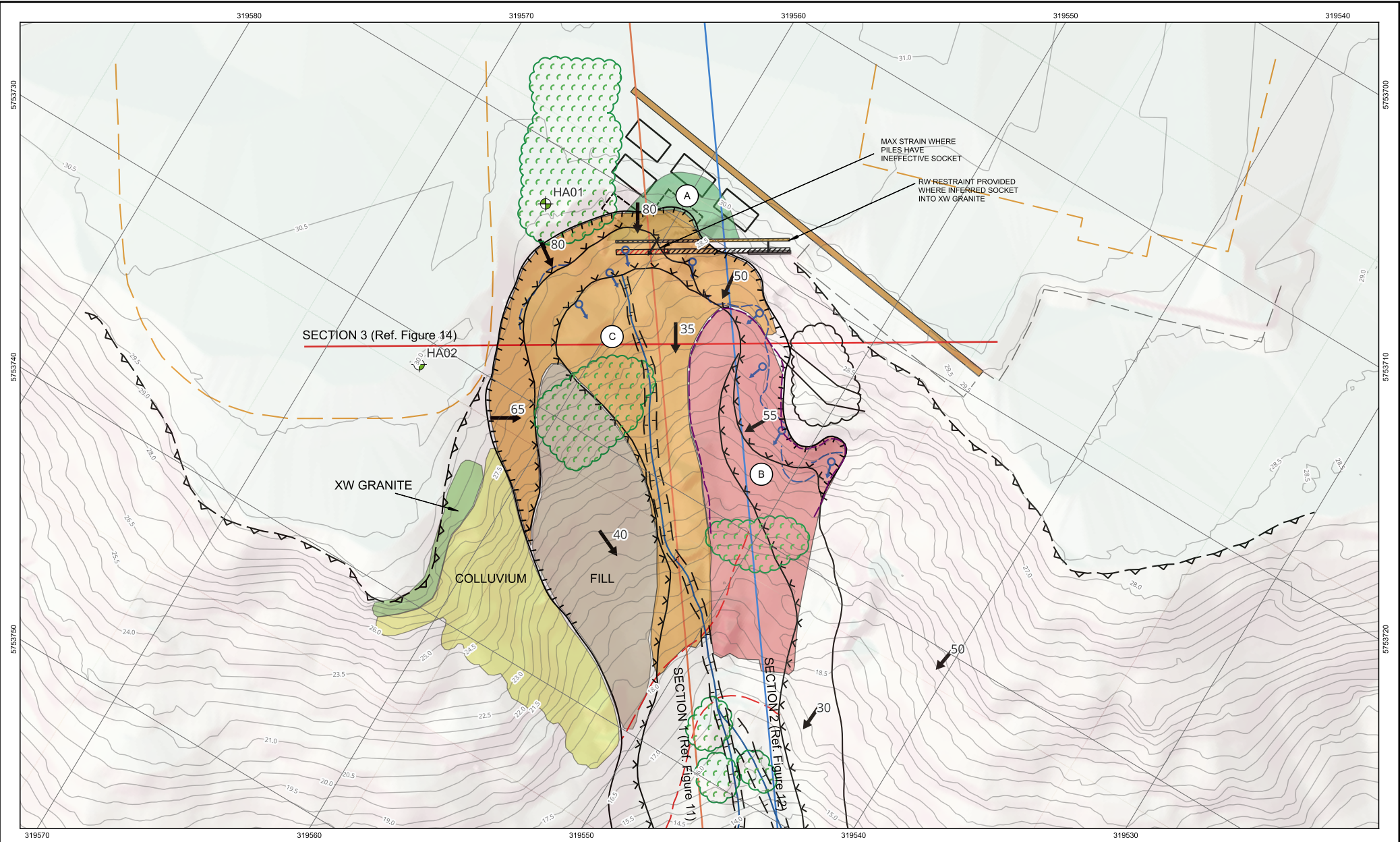
Figure 9



| | | | |
|--|--|--|---|
| Legend 0.5m ELEVATION CONTOUR POST LANDSLIDE SEEPAGE POINT SEEPAGE LINE BELOW DRAINAGE CHANNEL ERODED INTO DEBRIS | POST LANDSLIDE BUILDING FOOTPRINT BUILDING FOOTPRINT CONVEX SLOPE CHANGE GULLY CREST CONCAVE SLOPE CHANGE LANDSLIDE HEAD SCARP SLOPE DIRECTION AND MAGNITUDE | Scale 1:200 0 1 2 3 4 5 6 7 8 9 10 m Map Projection: GDA2020 / MGA zone 55 EPSG:7855 Created By: PSM Date: 08 Jul 2025 Revision: A Paper Size: A3 | Mornington Peninsula Shire Council McCrae Landslide - Causation 14/01/2025 LANDSLIDE CHARACTERISTICS PSM5665-075R Figure 10 |
|--|--|--|---|







Legend

- 0.5m CONTOUR LINES (2019 LIDAR)
- SEEPAGE POINT
- SEEPAGE LINE BELOW
- DRAINAGE CHANNEL ERODED INTO DEBRIS
- TRANSPORTED TREE/SHRUB
- Hand Augers

- POST I/SIDE BUILDING FOOTPRINT
- BUILDING FOOTPRINT
- CONVEX SLOPE CHANGE
- GULLY CREST
- CONCAVE SLOPE CHANGE
- LANDSLIDE HEAD SCARP
- SLOPE DIRECTION AND MAGNITUDE

NOTES:
(A) MAXIMUM SURCHARGE & WITH NO EFFECTIVE PILE SOCKET.
(B) 05/01/2025 FAILURE UNDERCUTS TOE OF TIP HEAD. (C) MOBILISES.
(C) 14/01/2025 MOVEMENT BENEATH PILE TOES WHERE FILL WAS AT MAXIMA.

Scale 1:150

0 2.5 5 m

Map Projection:
Horizontal Datum:
Grid: EPSG:7855

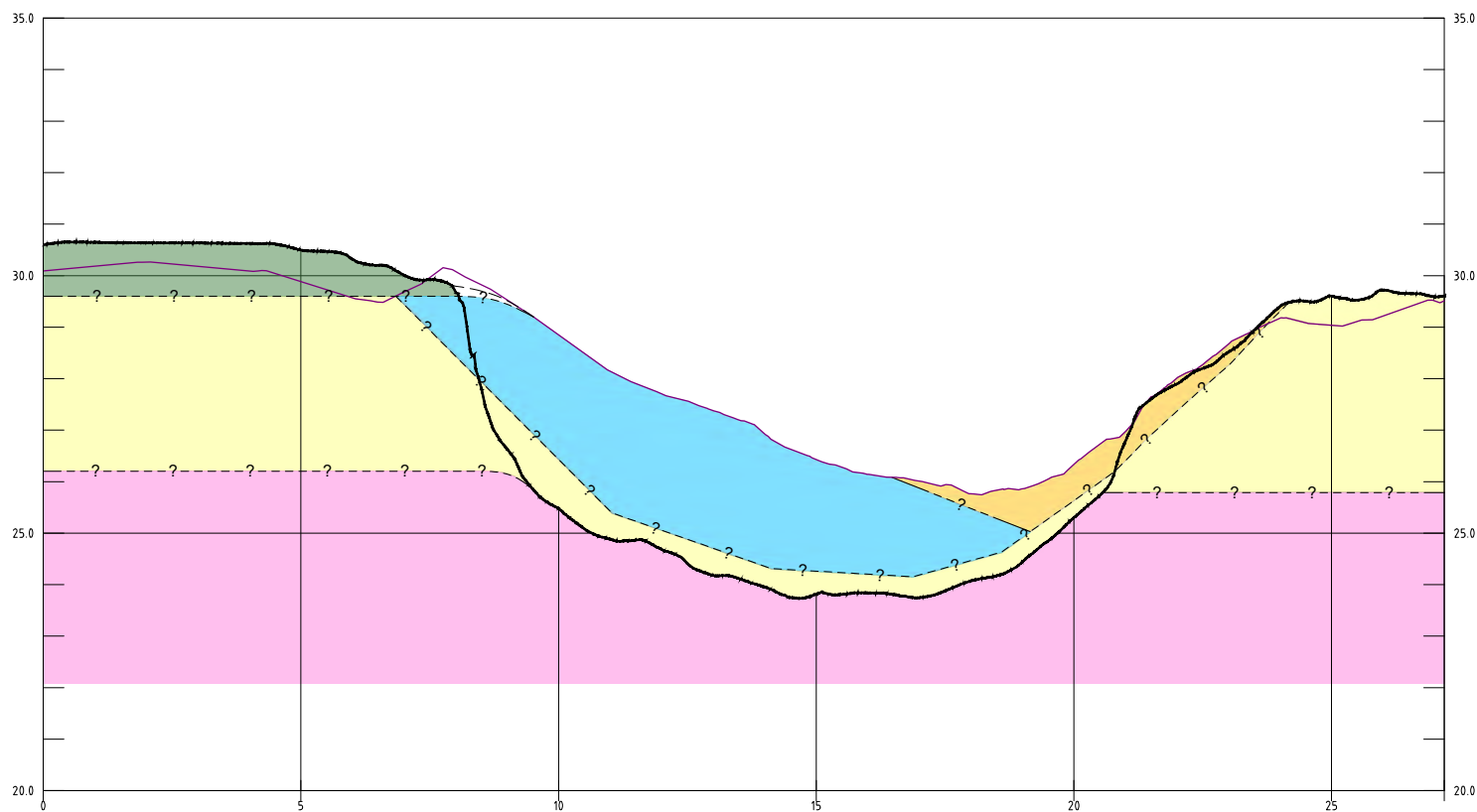
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| Date: | 21 Jul 2025 | Paper Size: | A3 |

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Mornington Peninsula Shire Council
McCrae Landslide - Causation






2025 LANDSLIDE STAGES

| | |
|--------------|-----------|
| PSM5665-075R | FIGURE 13 |
|--------------|-----------|



LEGEND:

-  POST LANDSLIDE SURFACE (2025)
-  EG_LIDAR_2023

-  FILL - RW
-  OLD FILL - 01
-  FILL - 6VP
-  COLLUVIUM
-  XW GRANITE



0 1.25 2.5 3.75 5
Scale (m) 1:100@A3

Mornington Peninsula Shire Council
McCrae Landslide – Causation

CROSS SECTION
SECTION 3

PSM5665-075R

Figure 14

Appendix A

Brief



Our Ref: BW:FH:25:434

Your Ref:

6 June 2025

www.weirlegalconsulting.com

E bweir@weirlc.com

M 0417 105 640

Dane Pope
Principal
PSM Consult Pty. Ltd.
Office 16,
Level 4, 60 Moorabool Street
Geelong VIC 3220

Sent by email to: Dane.Pope@psm.com.au

Dear Dane,

Brief to prepare report regarding causation of 2025 landslides in McCrae

We continue to act for Mornington Peninsula Shire Council in relation to various matters arising from the landslides in 2022 and 2025 on properties at 6 and 10-12 View Point Road, McCrae.

You have carried out investigations and prepared reports for Council previously, including:

- risk assessment dated 3 November 2023;
- further risk assessment dated 11 June 2024;
- Geotechnical Factual Report dated 9 April 2025;
- Landslide Risk Assessment dated 22 May 2025 (updated on 28 May 2024); and
- Sewers and stormwater factual report – under preparation, interim report due end of June 2025.

You accordingly have a detailed knowledge of the factual background regarding the landslides and are either collecting or in possession of relevant documents.

We are instructed that on 17 January 2025, Council formally engaged you through its former lawyers, Hardwood Andrews, to prepare reports on

- the cause of the two landslides which occurred on 5 January and 14 January 2025 respectively (**Causation Report**); and
- the risk to life status of various properties.

You have commenced carrying out the work necessary to prepare the Causation Report which has required the gathering of extensive information reflected in the above reports which is ongoing.

We confirm that the questions that you are required to answer in the Causation Report are:

1. What were the trigger/s of the landslides which occurred on 5 January and 14 January 2025?
2. If the trigger/s was/were not the cause, what was the cause?
3. If there is not one cause or the cause is not certain, then provide the likelihood/s of cause; and
4. With regards to the 2022 landslide:
 - a. Was there a causal relationship between the 2022 landslides and the 2025 landslides?
 - b. If the remediation works proposed after the 2022 landslides had been carried out, would this have changed the likelihood of the 2025 landslides?

You have advised that in order to assess with reasonable certainty the proportion of the contribution (if any) arising from leaky services, service trenches, stormwater assets or ground water, a combination of groundwater instruments and storm water flow meters must be installed and monitored during rainfall events. Standpipes and vibrating wire piezometers have been installed broadly consistent with the scope of services outlined in PSM5665-036L, 17 March 2025. Flow meters are yet to be installed and are difficult to procure – PSM are currently investigating alternative devices.

An interim factual report on the sewer and stormwater investigation is to be completed by the end of June 2025, subject to the availability and installation of flow meters or an appropriate alternative device.

Council requests that PSM provide an Interim Causation Report by mid August 2025 which will focus on:

- the contribution of fill placed at 6 and 10 -12 View Point Road (both old and recent fills);
- the construction of the retaining wall on 10-12 View Point Road and its relationship to the 2025 Landslides; and
- the relationship of the 2022 landslides to the 2025 landslides (question 4 above).

The interim report would be updated once climatic data becomes available and contributions from groundwater can be reasonably assessed. You have advised that rainfall events in the area have been very low in recent months, for example for May 2025 rainfall was 30mm against the average of 81mm. You are also waiting on responses to requests for information from South East Water on defects, and from the Department of Transport and Planning on the Peninsula Motorway to inform its impact on flow paths.

When meaningful wet weather events occur and the responses to these RFI's have been provided, please provide us with updates on proposed timing for the Final Causation Report.

The Interim and Updated Causation Reports that you produce should comply with the requirements of Order 44 of the Supreme Court (General Civil Procedure) Rules 2015. A copy of the Expert Witness Code of Conduct set out in Form 44A is attached to this letter and you should read it prior to producing the Causation Report and include the matters referred to in clause 3 of the Code.

Should you require clarification of your instructions or further briefing material, please let us know.

Please contact Frances Hall via fhall@weirlc.com or 0408007337 or Bronwyn Weir via bweir@weirlc.com or 0417105640 if you have any queries or would like to discuss this matter further.

Yours faithfully
Weir Legal and Consulting Pty Ltd

Irrelevant & Sensitive

Bronwyn Weir
Director

| Document ID | Document Date | Document Type | Title |
|--------------------|---------------|-----------------|---|
| PSM.5000.0001.0003 | 19/12/2006 | Attachment | 27072-Report-1.1.pdf |
| PSM.5000.0001.0008 | 9/08/2011 | Email | 209242.1 - Review of GeotAust Report, 14-16 View Point Rd, McCrae |
| PSM.5000.0001.0009 | 9/08/2011 | Attachment | 209242 - Report Review, GeoAust 8-8-11.pdf |
| PSM.5000.0001.0018 | 20/04/2020 | Attachment | P20_0578 - Endorsed Plans.PDF |
| PSM.5000.0001.0021 | 8/11/2023 | Electronic File | 121628.pdf |
| PSM.5000.0001.0022 | 8/11/2023 | Electronic File | 121754.pdf |
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| PSM.5000.0001.0025 | 8/11/2023 | Electronic File | 121837.pdf |
| PSM.5000.0001.0026 | 8/11/2023 | Electronic File | 121838.pdf |
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| PSM.5000.0001.0068 | 8/11/2023 | Electronic File | 122279.pdf |
| PSM.5000.0001.0069 | 8/11/2023 | Electronic File | 123053.pdf |
| PSM.5000.0001.0070 | 8/11/2023 | Electronic File | 123160.pdf |
| PSM.5000.0001.0086 | 29/04/2024 | Email | PSM5226-011E Shallow Landslide Barrier Design Parameters 10-12 View Point Rd, McCrae [IMAN-ACTIVE.FID592288] |
| PSM.5000.0001.0090 | 10/05/2024 | Attachment | DJI_0966.JPG |
| PSM.5000.0001.0091 | 10/05/2024 | Attachment | Area at toe of slope where barrier would be installed.HEIC |
| PSM.5000.0001.0092 | 10/05/2024 | Attachment | Landslide Barrier Sketch.pdf |
| PSM.5000.0001.0093 | 20/05/2024 | Email | PSM5226-012E Fees for addendum to advice |
| PSM.5000.0001.0094 | 13/08/2024 | Email | PSM5226-013E Fees for discussion of rectification solutions with the Experts |
| PSM.5000.0001.0099 | 24/10/2024 | Email | PSM5226-016E Risk to life - Willigenburg |
| PSM.5000.0001.0102 | 14/11/2024 | Attachment | PL Sim 4 50m3.pdf |
| PSM.5000.0001.0104 | 14/11/2024 | Attachment | 122573 Prep2 Rev1 - Report McCrae.pdf |
| PSM.5000.0001.0107 | 14/11/2024 | Attachment | PL Sim 6 20m3.pdf |
| PSM.5000.0001.0109 | 26/12/2024 | Electronic File | Concrete.Cast-In-Place.Flat.Grey.1.jpg |
| PSM.5000.0001.0110 | 6/01/2025 | Electronic File | IMG_0748.HEIC |
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| PSM.5000.0001.1278 | 31/01/2025 | Electronic File | BH 02.pdf |
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| PSM.5000.0001.1301 | 31/01/2025 | Electronic File | BH 23.pdf |
| PSM.5000.0001.1302 | 31/01/2025 | Electronic File | BH 24.pdf |
| PSM.5000.0001.1303 | 31/01/2025 | Electronic File | BH 25.pdf |
| PSM.5000.0001.1304 | 31/01/2025 | Electronic File | BH 26.pdf |
| PSM.5000.0001.1305 | 31/01/2025 | Electronic File | BH 27.pdf |
| PSM.5000.0001.1306 | 31/01/2025 | Electronic File | BH 28.pdf |
| PSM.5000.0001.1307 | 31/01/2025 | Electronic File | BH 29.pdf |
| PSM.5000.0001.1308 | 31/01/2025 | Electronic File | BH 30.pdf |
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| PSM.5000.0002.8438 | 11/02/2025 | Electronic File | P15_0321 - 10-12 Point View Road - vegetation removal.PDF |
| PSM.5000.0002.8439 | 11/02/2025 | Electronic File | P15_1503.01 - 10-12 View Point Road McCrae - dwelling additions.PDF |
| PSM.5000.0002.8447 | 11/02/2025 | Electronic File | 14-16 View Point Road McCrae Eng14_0465 P13_2073 EMP Approval w Endorsed EMP.pdf |
| PSM.5000.0002.8450 | 11/02/2025 | Electronic File | C2242_17 - Council Report Consent for Flood Prone Land endorsed plans rev 1.pdf |
| PSM.5000.0002.8453 | 11/02/2025 | Electronic File | C2242_17 - land stability material rev_1.PDF |
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| PSM.5000.0002.8531 | 11/02/2025 | Electronic File | P13_2073 - 14-16 View Point Road McCrae - Geotech Report endorsed 24.01.2017.pdf |
| PSM.5000.0002.8578 | 11/02/2025 | Electronic File | P13_2073 - 14-16 View Point Road McCrae - Peer Review.pdf |
| PSM.5000.0002.8580 | 11/02/2025 | Electronic File | C1493_06 - 16 Prospect Hill Road McCrae BUILDING PERMIT INCLUDES GEOTECHNICAL REPORT (A1175519).PDF |
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| PSM.5000.0002.8652 | 11/02/2025 | Electronic File | P03_0500 - 22 View Point Road McCrae - development plans.PDF |
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| PSM.5000.0002.8749 | 11/02/2025 | Electronic File | P12_0666 - 3 Penny Lane McCrae - Planning Permit, Endorsed Plans and Delegate Report.PDF |
| PSM.5000.0002.8760 | 11/02/2025 | Electronic File | Planning and geotechnical documents in relation to 3 Penny Lane.pdf |
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| PSM.5000.0002.8792 | 11/02/2025 | Electronic File | P00_2457 - 4 View Point Road McCrae - Dwelling plans.PDF |
| PSM.5000.0002.8795 | 11/02/2025 | Electronic File | P04_2662 - 4 View Point Road McCrae - Planning permit and endorsed plans - vegetation removal.PDF |
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| PSM.5000.0002.8946 | 11/02/2025 | Electronic File | C1302_04 - 6 Point View Road McCrae - BUILDING PERMIT INCLUDES GEOTECHNICAL REPORT.PDF |
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| PSM.5000.0002.8985 | 11/02/2025 | Electronic File | P04_1497 - 611 Point Nepean Road - Endorsed Plans (A5765756).PDF |
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| PSM.5000.0002.9106 | 11/02/2025 | Electronic File | Extract of The Herald newspaper 14 July 1952 in relation to landslip.png |
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| PSM.5000.0004.1740 | 2/04/2025 | Electronic File | PSM5665 -2025-04-02-11-33-42.jpg |
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| PSM.5000.0004.1889 | 2/04/2025 | Electronic File | IMG_2174.PNG |
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| PSM.5000.0004.2288 | 2/04/2025 | Electronic File | IMG_2178.HEIC |
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| PSM.5000.0004.3468 | 14/05/2025 | Electronic File | Browne St looking along strike of water main uphill.MP4 |

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| PSM.5007.0001.0019 | 21/07/2025 | Portable Document Format | PSM5226-005R (rectification).pdf.pdf |
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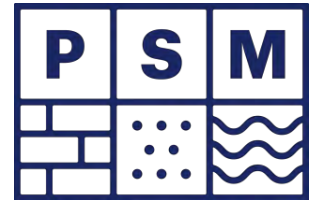
Appendix B

CV

Curriculum Vitae

Dane Pope

Principal Geotechnical Engineer



Dane Pope is a Principal Geotechnical Engineer at Pells Sullivan Meynink. He graduated from Griffith University, Gold Coast in 2006 with Bachelor of Engineering in Civil Engineering (Honours 1) and was awarded the University Medal. Dane joined PSM in November 2011, during which time he completed his master's degree in geotechnical engineering at UNSW in 2015.

Dane moved to Victoria in early 2016 and has actively been involved in civil infrastructure and property development projects throughout Victoria. Dane re-joined PSM in late 2019 to help to establish PSM's Victorian office.

Educational Qualifications:

- BE Hons Bachelor of Engineering (Civil), Griffith University, Gold Coast, 2006
- MEngSc. in Geotechnical Engineering, University of New South Wales, 2015

Professional Associations:

- Chartered Professional Engineer (CPEng)
- Registered Professional Engineer Queensland (RPEQ)
- Engineers Australia
- RPEV

- Unsaturated Soil Mechanics
- Industrial and residential subdivisional geotechnics including pavement design
- Surface Coal Mining and Quarry Operations and slope design
- Detailed instrumentation planning, installation and analysis
- Deep basement excavations

Experience:

- 2020 – Current: Principal Geotechnical Engineer, Pells Sullivan Meynink
- 2019 – 2020: Associate Geotechnical Engineer, Pells Sullivan Meynink
- 2015 – 2019: Senior to Associate Geotechnical Engineer, P.J. Yttrup & Associates
- 2011 – 2015: Senior Geotechnical Engineer, Pells Sullivan Meynink
- Mar 2011 – Oct 2011: Geotechnical Engineer, MEC Mining
- 2006 – 2011: Geotechnical Engineer, Golder Associates
- 2005 – 2006: Undergraduate Engineer, Macdonald Sheet Piling

Field of Competence:

- Landslide Risk Assessment for Local Government and Road Authorities

CIVIL PROJECTS

Bogong Village, Temporary Access Track, VIC

Geotechnical assessment and cut slope design for a temporary access track in deeply weathered granite and migmatite.

Great Ocean Road and inland routes, Landslide Remediation, VIC

Ongoing landslide remediation for over 20 sites from mid-2020 onwards. Sites include sideling fill batters, cut slopes and embankments in steep to very steep terrain. Remediation included rock bolt/anchor systems, rock fall netting, catch bunds, light weight fills, bored pile walls with capping beams and reconstruction of fill batters. All projects included the provision of IFC drawings and Construction Supervision Services.

Strzelecki Ranges flood recovery, Landslide Remediation, VIC

Detailed design of landslide remediation for a flood recovery site in the Strzelecki Ranges. Provision of IFC drawings.

Otway Ranges 2016 flood recovery, Landslide Remediation, VIC

Detailed design of landslide remediation for three flood recovery sites in the Otway Ranges in 2016. Designs included post and panel retaining walls, gabion walls and reconstruction of fill embankments. Provision of IFC drawings.

Cliff Road, Frankston, VIC

Landslide Risk Assessments for complex soil profile in existing landslide domain. Detailed field reconnaissance of the area. Managing complexities relating to the application of the Erosion Management Overlay (EMO) to existing properties which predate the recent application of the EMO.

Peer review, Mornington Peninsula, VIC

Peer review of Landslide Risk Assessment for development application in calcareous dune deposits.

Deviation Road, Fyansford, VIC

Landslide Risk Assessment for complex profile of Newer Volcanic Basalt overlying Gellibrand Marl. Groundwater monitoring to identify multiple aquifers.

McCurdy Road, Fyansford, VIC

Regression analysis of escarpment to inform permanent development offsets.

Wye River, Landslide Assessments, VIC

Landslide risk assessments for properties affected by the recent bushfires. Established structural domains of township to aid in better understanding mode of failure across the town. Assessment for proposed new stormwater network. Land Capability Assessments were generally completed for each proposed dwelling (for effluent disposal).

Cumberland River, Rockfall Assessment, VIC

Rock fall assessment for VicRoads included mapping by hand and photogrammetry methods. Detailed assessment of the structural controls of a 90 m high slope.

Sunshine North, Quarry infill sub-division, VIC

Rock Face Assessment of abandoned Basalt quarry for potential sub-division. Key inputs into landslide risk assessment.

Western Sydney Airport, Pavement Tender

Part of the successful bid team for the Pavement Tender. Worked with the Pavement Designers to assess risk of collapse settlement of engineered fill and differential settlement at cut/fill interfaces.

Geelong & Melbourne, Site Classification, VIC

Managing geotechnical investigations, analysis and reporting for residential developments in highly to extremely reactive soils with a focus on residual Basalt and Limestone profiles. Coordinating activities for a small team of engineers and a technician. Establishing and managing borehole reporting standards. Specialise in measuring total suction profiles to provide ground movement estimates for sites with abnormal moisture conditions. Land Capability Assessments for non-sewered properties.

Geelong Subdivisions, VIC

Geotechnical support from site investigation, pavement design and construction supervision for numerous greenfield sub-divisions in the Geelong region including Manzene Village, Lara West, Armstrong creek, Charlemont Rise, Leopold and Point Lonsdale Golf Course.

Bulk Earthworks Supervision, City of Greater Geelong, Colac Otway Shire, VIC

Provision of Level 1 certification of bulk earthworks for residential and commercial projects. Assessment and re-classification of lots to AS2870-2011.

Wintringham Social Housing, Traralgon VIC

Geotechnical investigation and temporary works for basement excavation in Old Volcanics.

Barwon Water Easement Investigations, City of Greater Geelong, Colac Otway Shire, VIC

Forensic investigations into collapse settlement in stormwater and sewer easements at three sites. Development of backfill specification to reduce risk of collapse settlement.

Brownfield Basalt quarry redevelopment, Tottenham VIC

Geotechnical investigation and design advice for industrial development on complex landfill site. Ground improvement strategies including rigid inclusions.

Armstrong Creek Town Centre, Investigation & Pavement Design, VIC

Geotechnical investigation for \$20M town centre including earthworks specification, detailed ground movement assessment in extremely reactive ground and pavement design.

Due Diligence - Dandenong South, VIC

Due diligence assessments for property developers across several large industrial sites throughout Dandenong South. Constraints typically including buildings approaching the end of their design life, poor quality subgrades and one backfilled sand quarry with inferred collapse settlement issues.

Deer Park, Boral, VIC

Ongoing auditing of bulk earthworks for backfill of existing Basalt quarry. Bulk earthworks design and specification for industrial development.

Campbellfield Industrial Development, Campbellfield, VIC

Investigation, settlement analysis and bulk earthworks design and supervision for proposed automated glass manufacturing facility with a high-performance building specification in a Basalt profile.

High Bay Developments and Expansion, Traralgon, VIC

Investigation, design advice and specification for three different high bay shed sites in a Basalt profile. Including validation of total suction profile four years after construction of the initial pavement slabs.

High Bay Development, Moorebank, NSW

Investigation, design advice and specification for proposed high bay sheds.

Greystanes Industrial Development, NSW

Investigation, design advice and specification for proposed industrial subdivision.

ACFS Logistics Terminal, Port of Brisbane, QLD

Subgrade remediation in poor soils. Footing and subgrade inspections including plate load testing.

Soleil Tower, Ten Storey Basement Excavation, Brisbane, QLD

Monitored excavation activities for a 10 storey basement car park excavation. Completed anchor inspections and review, 'hit and miss' sequencing, detailed instrumentation planning, implementation and reporting.

Vision Apartments, Seven Storey Basement Excavation, Brisbane QLD

Geotechnical investigation. Diaphragm wall design using PLAXIS and MSHEET. Supervision of diaphragm wall and secant pile wall construction. Rock bolt design, mapping, anchor supervision and review, 'hit and miss' excavation sequencing on all shoring walls.

Infinity Tower, Twelve Storey Basement Design, Brisbane QLD

Geotechnical investigation including pressuremeter testing. Design of shoring walls using PLAXIS.

Springfield to Darra Rail, Pile Design, Brisbane QLD

Successful tender pile design for 6 bridges varying in size from single span to ten span viaducts.

MINING PROJECTS

Lysterfield Quarry, Boral, VIC

Development of photogrammetry model. Geotechnical review of quarry slopes and providing slope stability advice. Review and update of structural model.

Montrose Quarry, Boral, VIC

Geotechnical review of quarry slopes and providing slope stability advice including rock fall mitigation and pit re-design to manage rock fall risk.

Wollert Quarry, Boral, VIC

Geotechnical review of quarry slopes and providing slope stability advice. Biannual inspection.

Clermont Coal Mine, QLD

Western wall review including three dimensional domains using ATV, field mapping and Vulcan. Site visit to calibrate structural model. Stability analysis of structurally complex pit slopes.

Burton Coal Mine, QLD

Maximised coal recovery from large slope failures without incident. Site based geotechnical support for two open cut terrace mines. Maintenance of highwall and lowwall hazard management systems (radar and survey) and monitoring of slope failures. Civil projects included; anchor pull-out tests, wet weather road construction, crane pad selection, plate load testing.

Baralaba Central and North Operations, QLD

Design reviews of pit slopes. Site inspections to provide operational advice for unstable slopes and their interaction with large dams.

Baralaba Expansion, Geotechnical Investigations – Feasibility, QLD

Geotechnical investigation and design of the proposed 200 m deep terrace mining operations. Training of site based rig geologists.

Norwich Park (BMA), Geotechnical Management System, QLD

Seconded to BMA's Norwich Park open cut coal mine. Pit inspections, mapping, radar monitoring and implementation of a revised TARP.

Tutupan Coal Mine, Pressuremeter Testing, South Kalimantan Indonesia

Trained a Jakarta based geotechnical engineer in the use of the pressuremeter at the South Kalimantan Coal Mine.

QC LNG and Pipelines, Pressuremeter Testing and Fieldwork, Gladstone, QLD

Large pressuremeter testing program in various materials from residual clays to high strength rock. Mobilisation of drilling rigs in difficult access conditions for the narrows pipeline project including use of a hover-barge.

TUNNEL PROJECTS

Clem 7 Tunnel, Investigation & Monitoring, Brisbane QLD

Coordinated drilling activities over the tunnel alignment, including permitting, service clearances, supervision and reporting. Installed and monitored settlement monitoring equipment including magnetic and rod extensometers,

vibrating wire piezometers, profile gauges and inclinometers.

Burnley Tunnel, VIC

Site based tunnel crack mapping of the tanked section of the tunnel.

Melbourn Metro Tunnel, VIC

Annual inspections and reporting on behalf of the insurer.

EXPERT OPINION/ADVICE

Cut slope instability, Geelong VIC

Geotechnical investigation into wedge failure of cut slope adjacent to a commercial development. Provision of conceptual remediation advice.

Retaining wall settlement, Victoria

Expert Opinion regarding settlement of gravity retaining wall including collapse settlement.

Residential subdivision, Western Sydney NSW

Forensic investigation into collapse settlement including review of property damage and site classification for 100's of dwellings.

Industrial subdivision, Melbourne

Forensic investigation into collapse settlement including review of property damage and remediation.

Preloading soft soils, Pinkenba QLD

Review of settlement controls and effectiveness of preloading activities for deep compressible sediments.

Damaged building assessments, Victoria

Numerous geotechnical investigations to support expert opinion reports for damaged homes on reactive ground. These typically including testing shrink swell, total suction and providing ground movement estimates for seasonal movement and movements due to the growth or removal of trees and removal of old timber floor dwellings prior to construction.

Publications, Articles and Patents

1. Developments in Engineering Geology the Geological Society (2016). Published Paper: Geological structural controls on stability of footwall slopes, an example from the Bowen Basin.
2. Field Measurements in Geomechanics (FMGM) Sydney, (Sept. 2015). Published Paper: Real-time monitoring of cut slopes and the importance of identifying the mode of failure.

Appendix C

Chronology – supporting facts

Coburn subdivision - north side of The Avenue

In 1912, Ellen Coburn was the owner of just over 89 acres, bound by The Avenue, Point Nepean Road and Bay View Road to the south-east. Coburn subdivided the land and created Bartels, Catherine and William streets. View Point Road, Margaret Street, Coburn Avenue, The Eyrie, Prospect Hill Road, Henry Street, Percy Street and the north side of The Avenue were also developed during this subdivision. Lots were sold from 1913 right up to 1995 by the Coburn family. The north side of The Avenue, east of Catherine Street (including nos. 13-43) was part of the Coburn subdivision (LV:V3680/F896).

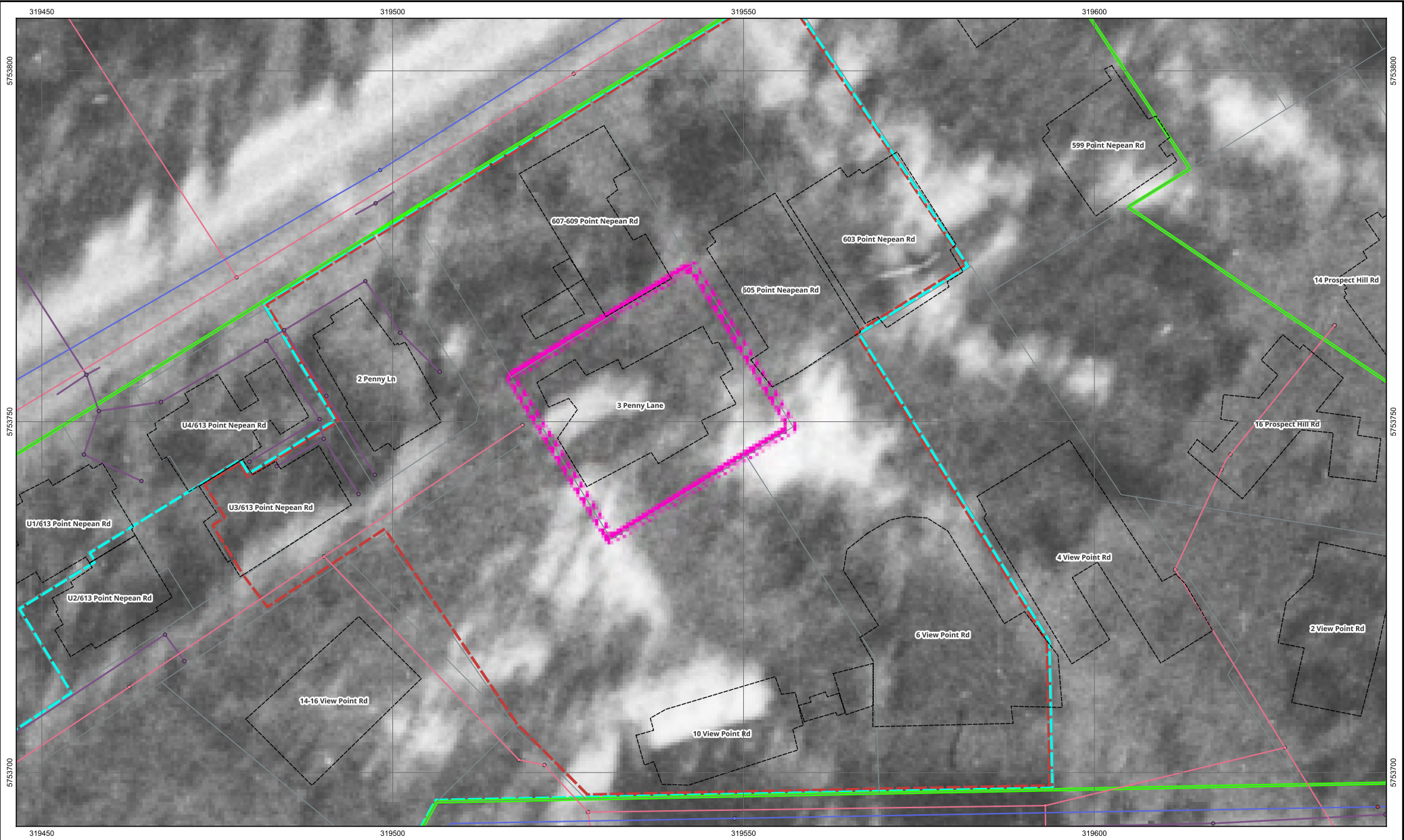
Subdivision history and sale of lots of the Coburn estate. Source: MPSC Heritage Review, Area 2 Vol. 2 - Place and Precinct Citations (2017, September).



Reference to Arthur's Seat Estate. Source: The Herald, (1925, Jul 15), Melbourne VIC 1861 - 1954, p. 4.

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|------------------------------------|-------------|
| Mornington Peninsula Shire Council | |
| McCrae Landslide | |
| SUPPORTING EVIDENCE | |
| PSM5665-075R | Appendix C1 |





Legend

- Property Boundaries
- Evacuation Order Area (17/01/2025)
- Evacuation Order Area (14/02/2025)
- Evacuation Order Area (20/02/2025)

NOTES:

1. Aerial imagery taken from Lotsearch 1939.

Scale 1:500

0 5 10 15 20 25 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

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| | Created By: PSM | Revision: A |
| | Date: 14 Jul 2025 | Paper Size: A3 |

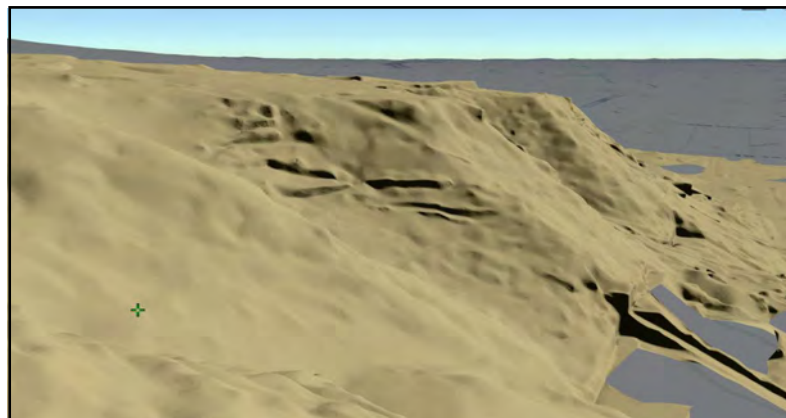
Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

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| PSM5665-075R | APPENDIX C2 |
|--------------|-------------|



Photo of 10-12 View Point Road from approximately rear of 599 Point Nepean Road, dated 1930-1950.



Diospatial DEM model from approximately the same location.



Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C3



Legend

- Property Boundaries
- Evacuation Order Area (17/01/2025)
- Evacuation Order Area (14/02/2025)
- Evacuation Order Area (20/02/2025)

NOTES:

1. Aerial imagery taken from Lotsearch 1955.

N

0510152025

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

Created By:
PSM

Date:
14 Jul 2025

Revision:
A

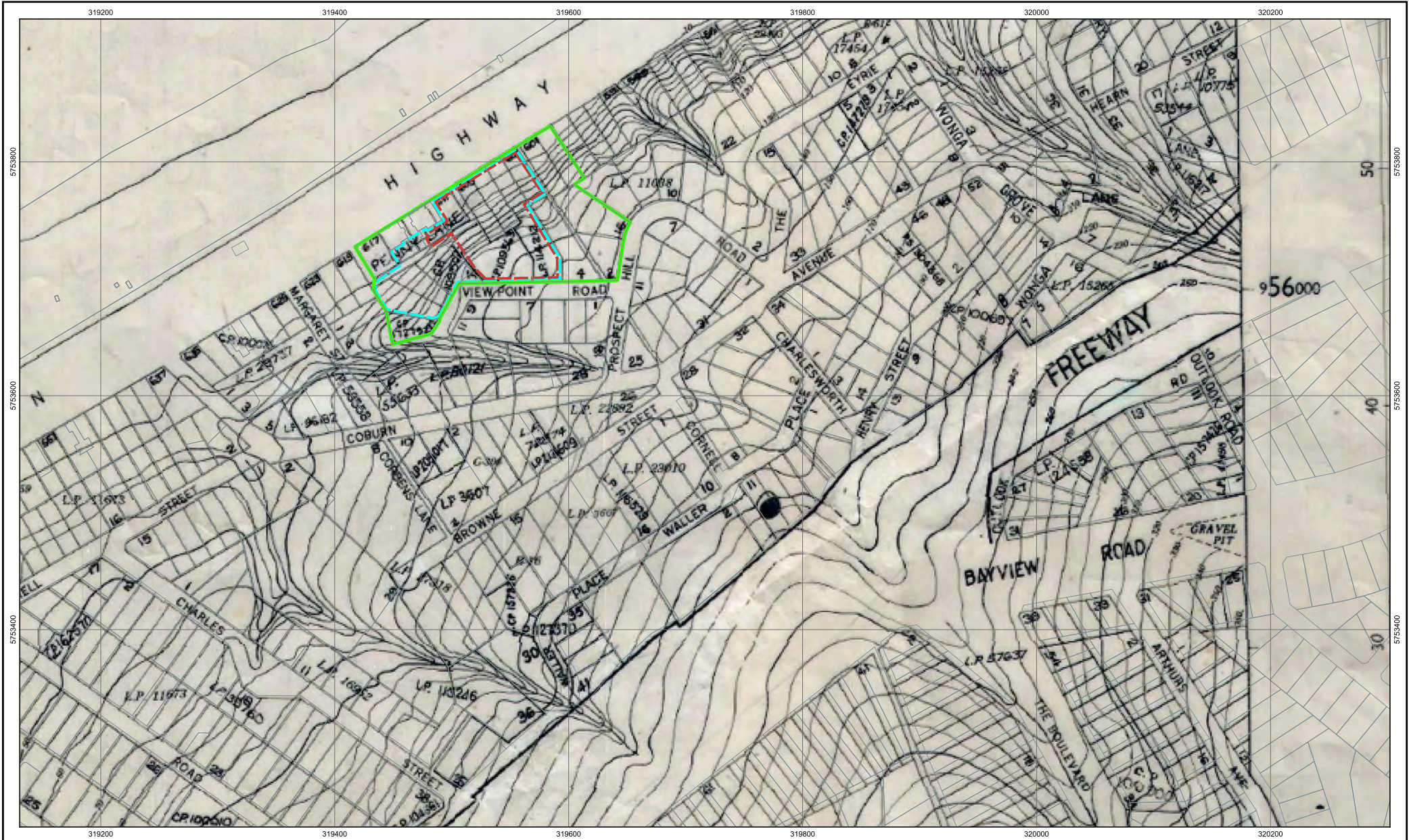
Paper Size:
A3

Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

PSM5665-075R

APPENDIX C4



- Legend
- Evacuation Order Area (17/01/2025)
 - Evacuation Order Area (14/02/2025)
 - Evacuation Order Area (20/02/2025)

NOTES:
1. Historical Plan shown is a 10 ft survey of McCrae, taken from the Department of Crown Lands and Survey Plan 1957.

N

0

20

40

60

80

100 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

Created By:
PSM

Date:
14 Jul 2025

Revision:
A

Paper Size:
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Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

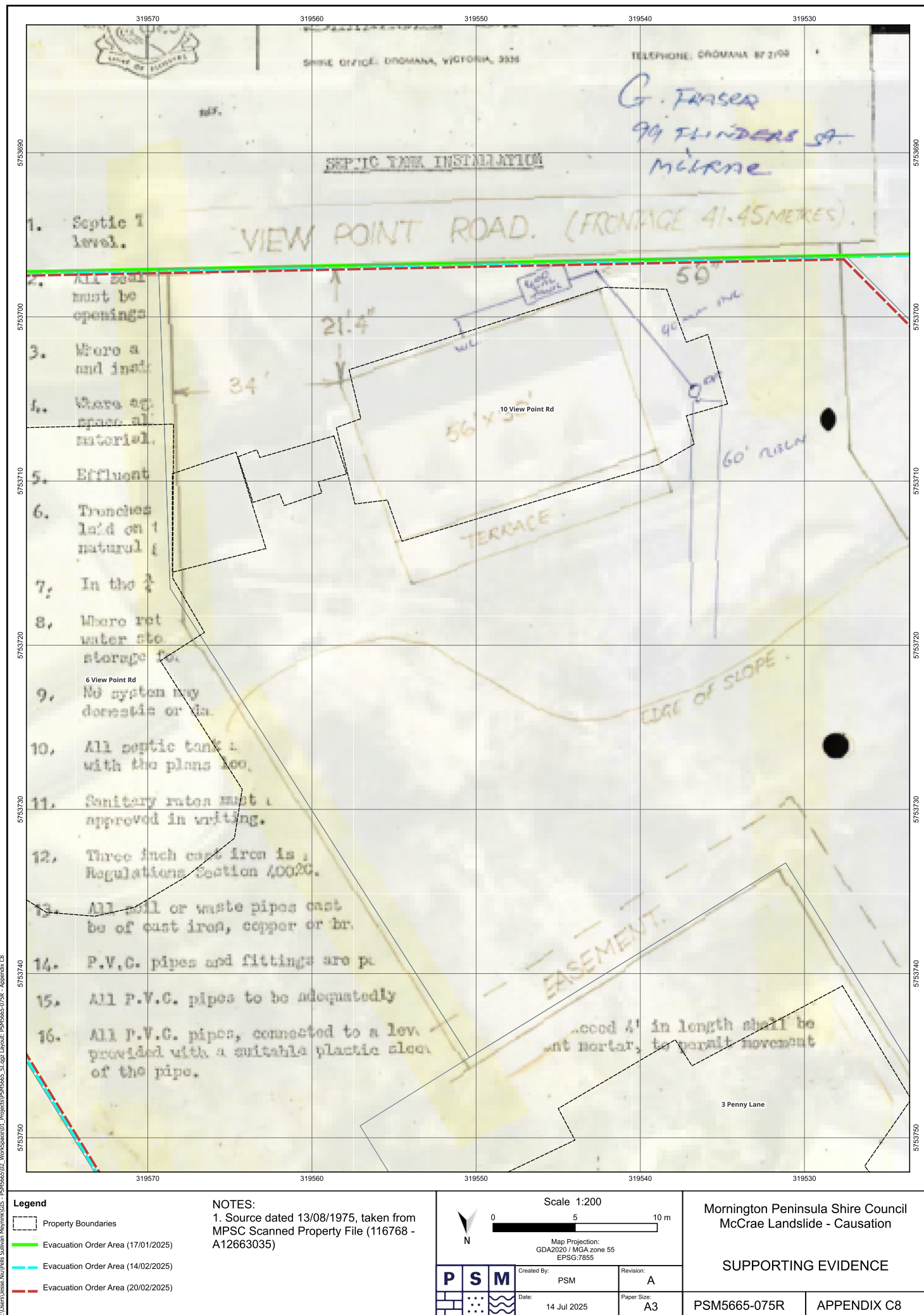
| | |
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| PSM5665-075R | APPENDIX C5 |
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| | | | | | | | | | |
|---|--|--|--------------------|----------------|----------------------|-------------------|---|--------------|-------------|
| <p>Legend</p> <ul style="list-style-type: none">Property BoundariesEvacuation Order Area (17/01/2025)Evacuation Order Area (14/02/2025)Evacuation Order Area (20/02/2025) | <p>NOTES:</p> <p>1. Aerial imagery taken from Lotsearch 1970.</p> | <p>Scale 1:500</p> <p>0 5 10 15 20 25 m</p> <p>Map Projection: GDA2020 / MGA zone 55 EPSG:7855</p> <table border="1"><tr><td>Created By: PSM</td><td>Revision: A</td></tr><tr><td>Date: 14 Jul 2025</td><td>Paper Size: A3</td></tr></table> | Created By: PSM | Revision: A | Date: 14 Jul 2025 | Paper Size: A3 | <p>Mornington Peninsula Shire Council McCrae Landslide - Causation</p> <p>SUPPORTING EVIDENCE</p> <table border="1"><tr><td>PSM5665-075R</td><td>APPENDIX C6</td></tr></table> | PSM5665-075R | APPENDIX C6 |
| Created By: PSM | Revision: A | | | | | | | | |
| Date: 14 Jul 2025 | Paper Size: A3 | | | | | | | | |
| PSM5665-075R | APPENDIX C6 | | | | | | | | |



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|--|---|--|-------------|-----|-----------|---|-------|-------------|-------------|----|---|--------------|-------------|
| <p>Legend</p> <ul style="list-style-type: none">Evacuation Order Area (17/01/2025)Evacuation Order Area (14/02/2025)Evacuation Order Area (20/02/2025) | <p>NOTES:</p> <p>1. Aerial Photo from 1972.</p> | <div><div><div>Scale 1:3,000</div><div>0 20 40 60 80 100 m</div><div>Map Projection: GDA2020 / MGA zone 55 EPSG:7855</div></div><table border="1"><tr><td>Created By:</td><td>PSM</td><td>Revision:</td><td>A</td></tr><tr><td>Date:</td><td>14 Jul 2025</td><td>Paper Size:</td><td>A3</td></tr></table></div> | Created By: | PSM | Revision: | A | Date: | 14 Jul 2025 | Paper Size: | A3 | <div>Mornington Peninsula Shire Council</div> <div>McCrae Landslide - Causation</div> <div>SUPPORTING EVIDENCE</div> <table border="1"><tr><td>PSM5665-075R</td><td>APPENDIX C7</td></tr></table> | PSM5665-075R | APPENDIX C7 |
| Created By: | PSM | Revision: | A | | | | | | | | | | |
| Date: | 14 Jul 2025 | Paper Size: | A3 | | | | | | | | | | |
| PSM5665-075R | APPENDIX C7 | | | | | | | | | | | | |





Legend

- Property Boundaries
- Evacuation Order Area (17/01/2025)
- Evacuation Order Area (14/02/2025)
- Evacuation Order Area (20/02/2025)

NOTES:

1. Aerial imagery taken from Lotsearch 1977.

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M

Created By: PSM

Date: 14 Jul 2025

Scale 1:500

0 5 10 15 20 25 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

Revision: A

Paper Size: A3

Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

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| PSM5665-075R | APPENDIX C9 |
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| | | | | | | | | | | | | | |
|---|--|--|-------------|-----|-----------|---|-------|-------------|-------------|----|--|--------------|--------------|
| <p>Legend</p> <ul style="list-style-type: none">Property BoundariesEvacuation Order Area (17/01/2025)Evacuation Order Area (14/02/2025)Evacuation Order Area (20/02/2025) | <p>NOTES:</p> <p>1. Aerial imagery taken from Lotsearch 1979.</p> | <p>Scale 1:500</p> <p>0 5 10 15 20 25 m</p> <p>Map Projection: GDA2020 / MGA zone 55 EPSG:7855</p> <table border="1"><tr><td>Created By:</td><td>PSM</td><td>Revision:</td><td>A</td></tr><tr><td>Date:</td><td>14 Jul 2025</td><td>Paper Size:</td><td>A3</td></tr></table> | Created By: | PSM | Revision: | A | Date: | 14 Jul 2025 | Paper Size: | A3 | <p>Mornington Peninsula Shire Council McCrae Landslide - Causation</p> <p>SUPPORTING EVIDENCE</p> <table border="1"><tr><td>PSM5665-075R</td><td>APPENDIX C10</td></tr></table> | PSM5665-075R | APPENDIX C10 |
| Created By: | PSM | Revision: | A | | | | | | | | | | |
| Date: | 14 Jul 2025 | Paper Size: | A3 | | | | | | | | | | |
| PSM5665-075R | APPENDIX C10 | | | | | | | | | | | | |

22 FEB 1979

A.L. Da Costa,
61A Main Street,
Mornington. 3931.

Dear Sirs

PLAN OF SUBDIVISION PS. 2486

OWNER: D'Helin & Marriot

I enclose herewith the sealed plan in respect of the above
subdivision.

Yours faithfully,

Irrelevant & Sensitive

(Peter S. Parkinson)
SHIRE ENGINEER

Enc.



Plans sealed regarding subdivision of 6 View Point Road and 10-12 View Point Road. Source: MPSC Scanned Property File (116768 - A12663035)

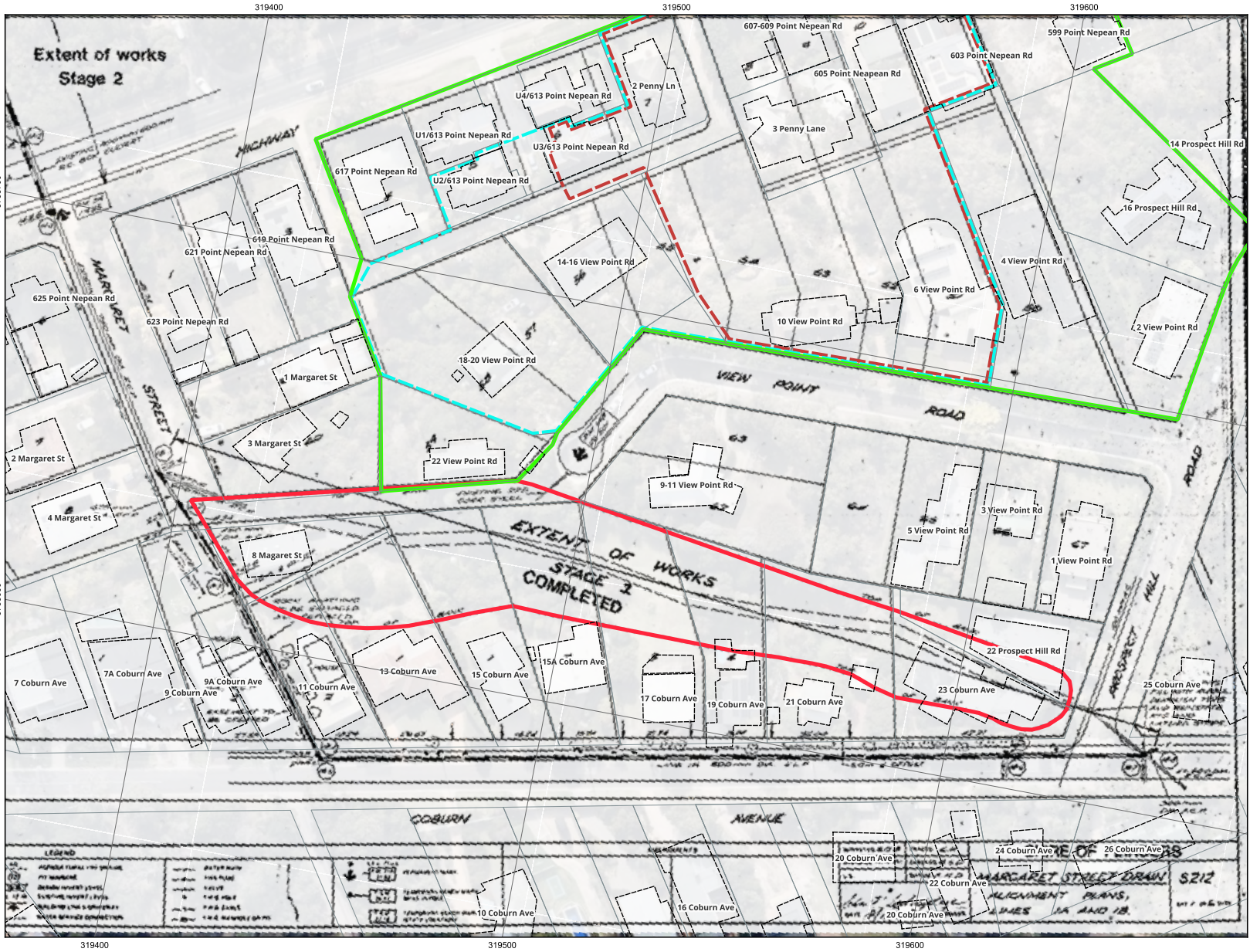


Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C11



Legend

Property Boundaries



Extent of Margaret St Drain Works

Evacuation Order Area (17/01/2025)

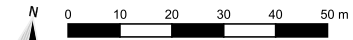
Evacuation Order Area (14/02/2025)

Evacuation Order Area (20/02/2025)

NOTES:

1. Historical Plan sourced from Shire of Flinders Margaret Street Drain 1980.

Scale 1:1,000



Map Projection:
GDA2020 / MGA zone 55
EPSG:7855



Created By: PSM
Date: 14 Jul 2025

Revision: A
Paper Size: A3

Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

PSM5665-075R

APPENDIX C12



Legend

Property Boundaries

Scale 1:500

0 5 10 15 20 25 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

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| Created By: | PSM | Revision: | A |
| Date: | 14 Jul 2025 | Paper Size: | A3 |

Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

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| PSM5665-075R | APPENDIX C13 |
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116768

FILE 10 Viewmont Rd MCRAE SHIRE OF FLINDERS 102

COMPLAINT SHEET

DATE 16/9/87 PHONE 863856

NAME Mr Rodcliffe

ADDRESS 607 Nepean Highway, McCrae

COMPLAINT Raw sewage coming onto Mr Rodcliffe's property from adjoining property please investigate

Received by Kerri

| |
|-----------------------|
| POLLUTION |
| TOILET BLOCKS |
| HOUSING |
| REFUSE |
| DRAINAGE |
| OTHER NUISANCES |
| OTHER PREMISES N.E.I. |
| COMPLAINTS - |
| FOOD &/OR PREMISES |

| DATE | OBSERVATIONS AND ACTION TAKEN |
|---------|---|
| 21-9-87 | Called at above property - seepage at rear of the property may be associated with septic tank in adjoining property. |
| | "Rosmarin" 10 Bayview Rd, MCRAE. Unoccupied. Seepage contains Brown sediment - most likely borne from soil/rock minerals leachate. Effluent? |
| 22-9-87 | Above property investigated - Connection to the sewer has been made dated 30/3/83. |
| | Called at residence of the complainant. Card left advising that the property concerned was connected to sewer and to contact if further information required. |
| | N.F.A. File |

Evidence of raw sewage running onto 607 Point Nepean Road property, dated 16/09/1987 - 22/09/1987. Source: MPSC Scanned Property File (116768 - A12663035)

Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE



PSM5665-075R Appendix C14



Photo of gully from Point Nepean Road. Gully and crest of slope on 10-12 View Point Road is well vegetated, dated June 1996. Source: MPSC Scanned Property File (148726 - A13522532)



Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C15



- Legend
- Property Boundaries
 - Evacuation Order Area (17/01/2025)
 - Evacuation Order Area (14/02/2025)
 - Evacuation Order Area (20/02/2025)

NOTES:
1. Aerial imagery dated 2003, supplied by MPSC GIS.

N

05101520 m

Scale 1:500

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

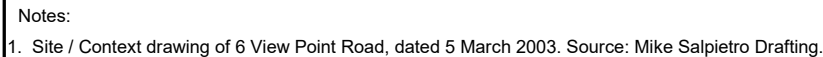
Created By:
PSM

Date:
14 Jul 2025

Revision:
A

Paper Size:
A3

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| Morrington Peninsula Shire Council McCrae Landslide - Causation | |
| SUPPORTING EVIDENCE | |
| PSM5665-075R | APPENDIX C16 |



SUPPORTING EVIDENCE

Appendix C17





SOUTH EAST WATER LIMITED
ABN 69 066 902 547

PROPERTY SEWERAGE PLAN

WARNING: This plan is issued to assist you in identifying property sewerage drains and/or points of connection through further investigation only. It is not to be used for any other purpose, including to identify any other assets, property boundaries or dimensions. You are put on notice that the map base is not created by South East Water and South East Water cannot guarantee the accuracy, adequacy or completeness of any information in or forming part of the plan, including the location of property sewerage drains and/or points of connection. Accordingly, the location of all assets should be proven by hand on site prior to commencement of any works and you should make your own independent inquiries as to the location of all assets and property boundaries and dimensions. All liability at law (including under statute), and all conditions and warranties implied by law (including under statute), are expressly excluded except that liability and those conditions and warranties which cannot be excluded. In respect of liability and conditions and warranties which cannot be excluded, South East Water's liability to you is limited, as far as law (including statute) permits, to resupplying the plan or paying the cost of resupplying the plan. Please note that information contained within the plan may have altered before or after the issue of the plan.
Scale: 1:500 approx unless measurements shown.

Date: 03/03/2004

01214639

PIC NO:
PIC NO:

PSP NO:

PSP NO: 1214639

| | |
|-----------------------------------|---|
| PROPERTY REF. 025/100477/6 | FIXTURES 2 Closet 2 Bath 2 Shower 2 Basin 1 Sink 1 Trough Urinal Clothes Washing Machine Dishwashing Machine Swimming Pool Waste Disposal Unit Other |
| ADDRESS 6 View Point Dr | |
| LOT NO M'Crae | |

| | |
|--|--|
| UPDATED PLAN 183 MAR 2004 RECEIVED | |
| PSP No. 1214639 FOLLOWING COMPLETION OF WORK THIS PLAN MUST BE RETURNED TO SEWL PO BOX 1382, MOORABBIN 3189 OR FAX 9552 3571 THIS PLAN MUST SHOW UPDATED 'AS CONSTRUCTED' BELOW GROUND DRAINS & FIXTURE | |
| PIC No. 795800 | |
| BT BOUNDARY TRAP REQUIRED (WHEN INDICATED) TITLE and ROAD ALIGNMENT SEWER OFFSET | POINT LOCATION E.P. 2 N.S.L. 32.24 I.L. 28.76 DIA 100 DEPTH 3.28 CHAINAGE FROM M/H TO:- B.C.H. 44.5 U/S M/H |

| | | | | | | |
|---------|---|---|---|---|-----------|-------------|
| ENCUMB. | 1 | 2 | 3 | 4 | ISSUED | 11 DEC 2003 |
| RECORD | 5 | 6 | 7 | 8 | FINALISED | |

****All installations to be in accordance with the**

Property Sewerage Plan of 6 View Point Road with updated Trench along boundary between 6 and 10-12 View Point Road, dated 3 March 2004.

Source: SEW PropertyConnect.

Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE



PSM5665-075R

Appendix C18



- Legend
- Property Boundaries
 - Evacuation Order Area (17/01/2025)
 - Evacuation Order Area (14/02/2025)
 - Evacuation Order Area (20/02/2025)

NOTES:
1. Aerial imagery dated 2005, supplied by MPSC GIS.

Scale 1:500

0 5 10 15 20 m

Map Projection:
GDA2020 / MGA zone 55
EPSG:7855

| | | | |
|-------------|-------------|-------------|----|
| Created By: | PSM | Revision: | A |
| Date: | 14 Jul 2025 | Paper Size: | A3 |

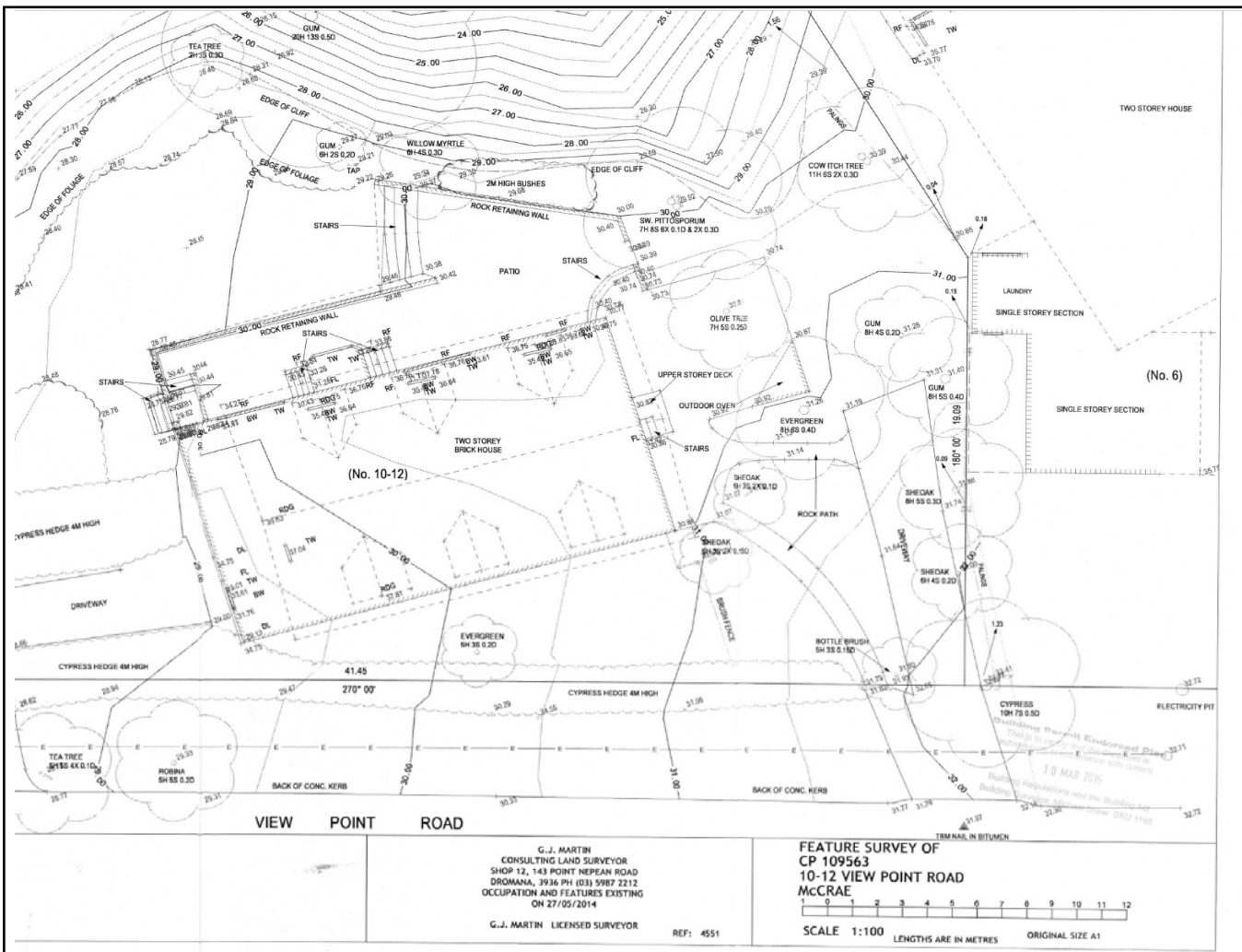
PSM

Created By: PSM
Date: 14 Jul 2025

Mornington Peninsula Shire Council
McCrae Landslide - Causation

SUPPORTING EVIDENCE

| | |
|--------------|--------------|
| PSM5665-075R | APPENDIX C19 |
|--------------|--------------|



Notes:

1. Feature Survey of 10-12 View Point Road with existing trees and surface contours, dated 27 May 2014. Source: G.J. Martin Feature Survey (MPSC ref. P15_0321 - 10-12 Point View Road - vegetation removal).

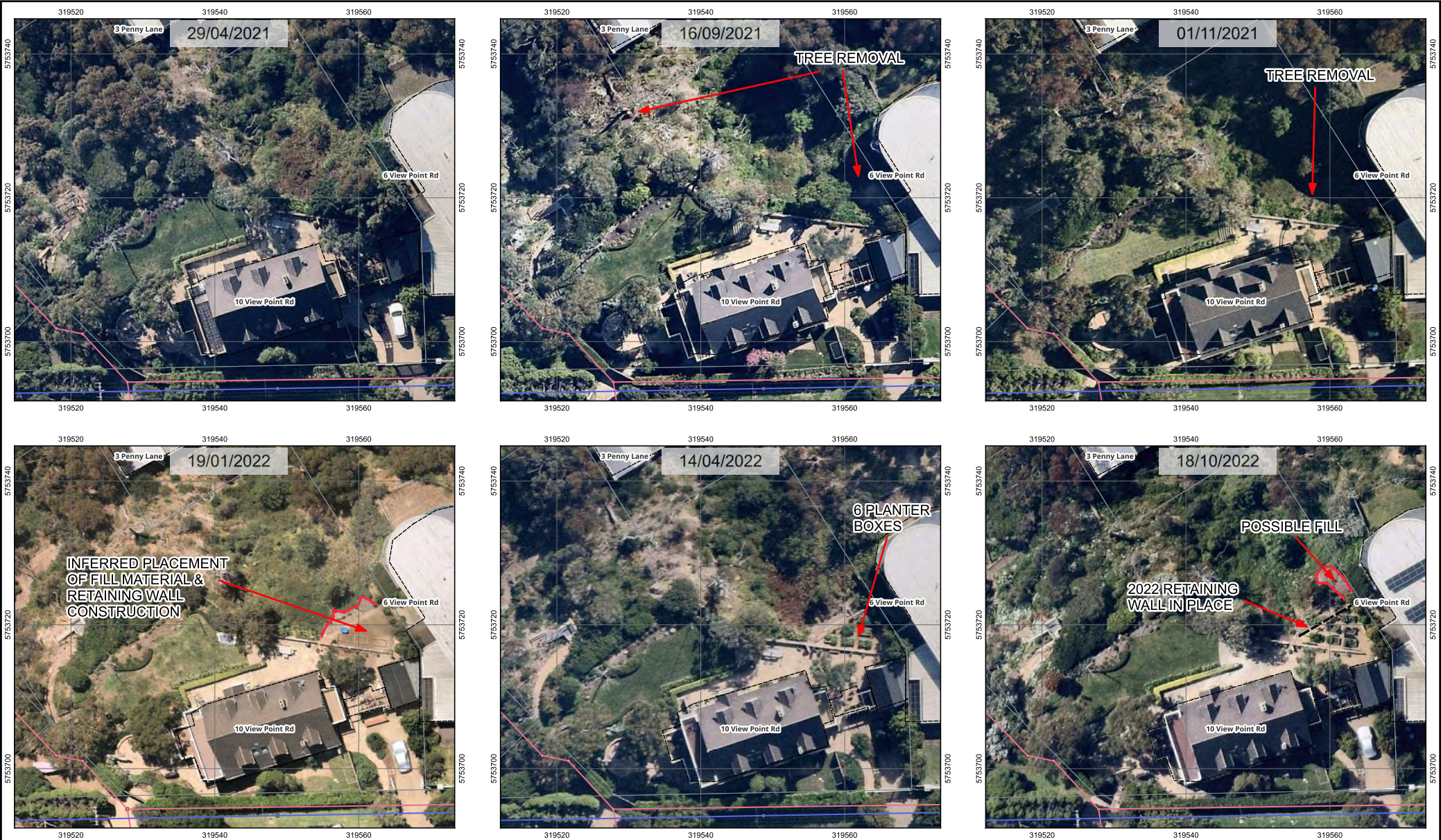
Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE



PSM5665-075R

Appendix C20





| | | | | |
|--------------------------------------|--|---|---|--------------|
| Legend Property Boundaries | NOTES: 1. Aerial imagery sourced from Nearmap. 2. 14/01/2025 imagery marked (*) has been corrected from the reported Nearmap date (30/12/2024) due to source error. | Scale 1:500 0 5 10 15 20 25 m Map Projection: GDA2020 / MGA zone 55 EPSG:7855 | Mornington Peninsula Shire Council McCrae Landslide - Causation | |
| | | | SUPPORTING EVIDENCE | |
| | Created By: PSM Date: 16 Jul 2025 | Revision: A Paper Size: A3 | PSM5665-075R | APPENDIX C22 |



Trees removed from adjacent to 2022 Retaining Wall location on 10-12 View Point Road, dated February 2021. Source: Nearmap.

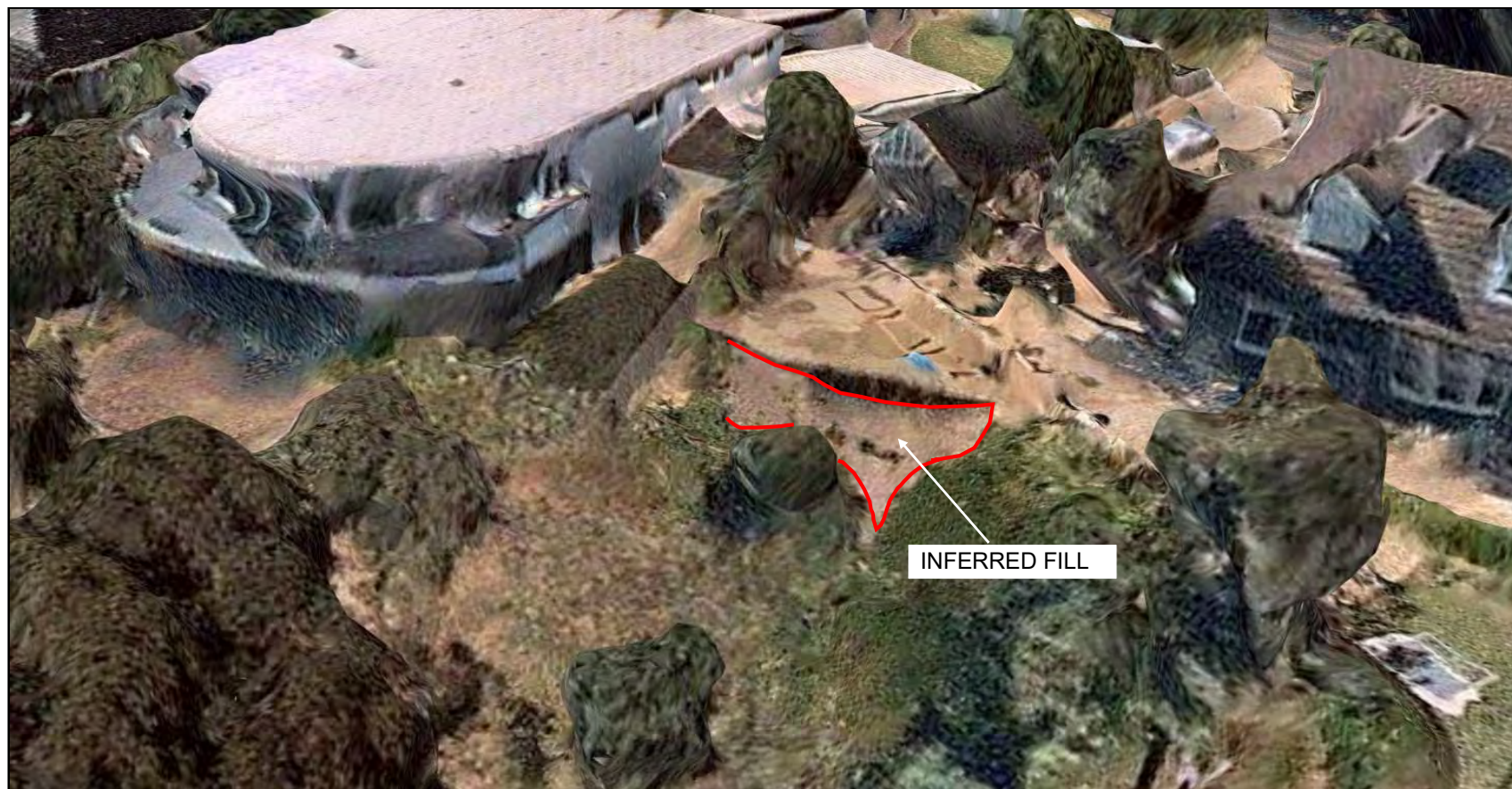


Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C23



Trees removed from adjacent to 2022 Retaining Wall location on 10-12 View Point Road, dated January 2022. Source: Nearmap.

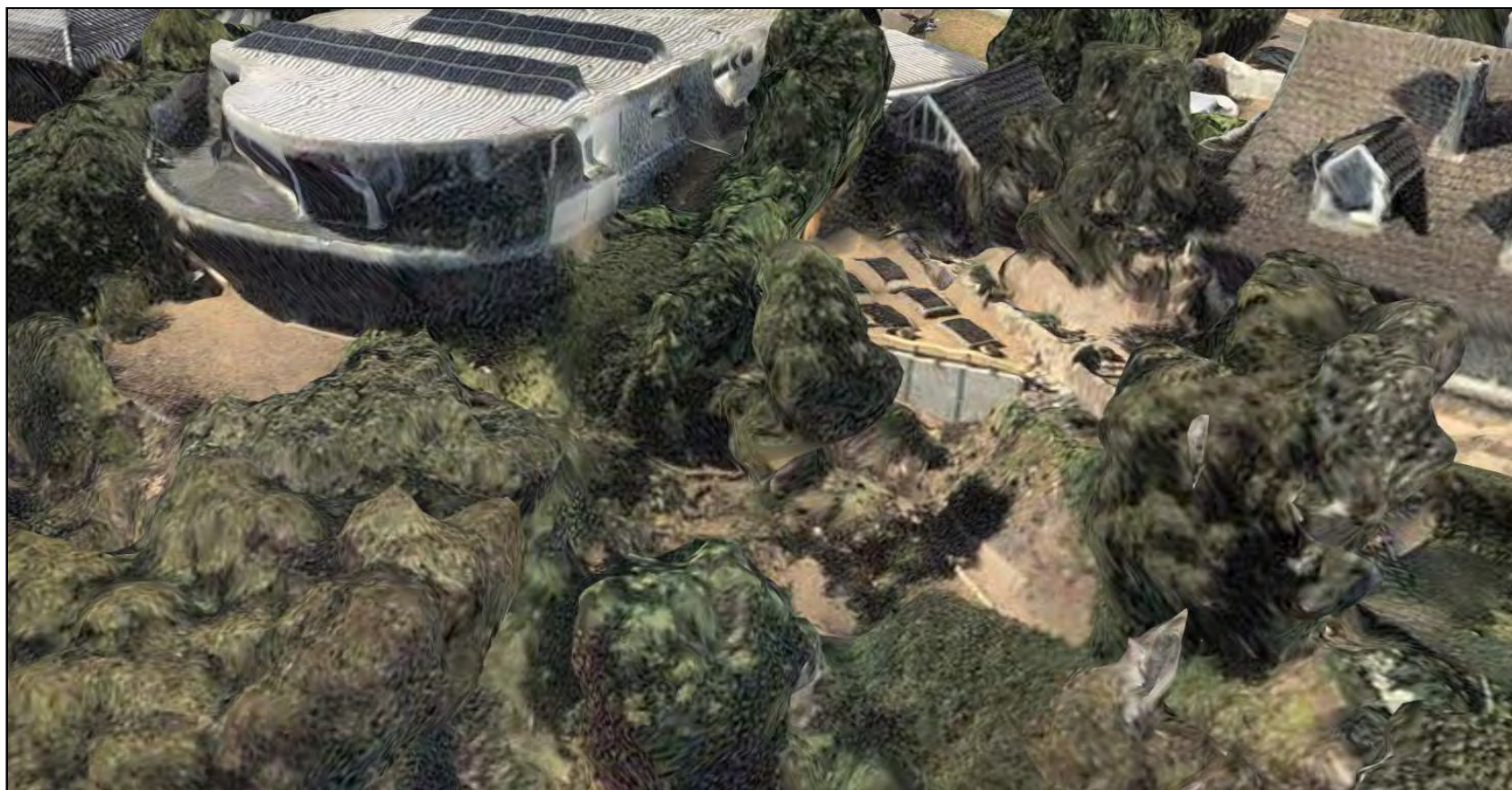


Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C24



Trees removed from adjacent to 2022 Retaining Wall location on 10-12 View Point Road, dated December 2023. Source: Nearmap.

Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE



PSM5665-075R

Appendix C25



Trees removed from adjacent to 2022 Retaining Wall location on 10-12 View Point Road, dated 29 January 2024. Source: Nearmap.



Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C26

Task Number:1107857/001

Task Address:6 VIEW POINT ROAD, MCCRAE VIC 3938 MapRef : 159A9

Program Name:

Task Work Type:Planned Maintenance - Repair

Source Of Work:

Facility:

Permit Not Required:No

Permit Pre Approved:No

Permit Reason:Other

Permit Other Reason:

Task Story:[REDACTED] [7/12/2022 15:30] [AWARDED] Property Number:02E//00477/6 [FT] [DNf0019] [7/12/2022 17:33] [ON SITE] checked retic NEP42-507 all clear stormwater running down the gutter not associated with this Located small hole in nature strip goes down about 400mm Will pass onto civil crew to tape off Recomend CCTV of retic 207336 and pcb 555031 as this is roughly where hole is [FT] [DNf0038] [8/12/2022 13:37] [IN TRANSIT] arrived on site, jumped on excavator backfilled hole reinstated road, cleaned up and washed down road [FT] [DNf0038] [8/12/2022 13:38] [IN TRANSIT] disregard last notes [FT] [DNf0038] [8/12/2022 14:52] [IN TRANSIT] arrived on site, found narrow deep hole, backfilled, top soil and seeded



Collapse settlement repaired in sewer trench in front of 6 View Point Road pedestrian gate. Source: SEW FOI Request (2025, June 6) pp. 28 and 39.



Mornington Peninsula Shire Council

McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C27

Inferred Wet Soils



12 May 2023



Dry soils

16 January 2025

Evidence of seepage points in drone photography.



Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C28



PSM inspection by AW, 2022 Retaining Wall condition dated 23 November 2023.

Mornington Peninsula Shire Council
McCrae Landslide

SUPPORTING EVIDENCE



PSM5665-075R

Appendix C29

[REDACTED] [30/1/2025 17:29] [WORK COMPLETE] Location of burst updated via Edit Asset to correct location
Caller Details:sss
Request Details:Burst on the 150UPVC main opp 2 the boulevard. water Ops located leak
Action Taken :Water Network - Water Main - Repair of burst in nature strip
Task CCT:Water Network - Water Main - Repair of burst in other location
Failure Details:1 Water Main - Longitudinal split - Fatigue
Task Priority:5 31/12/2024 11:39
Is Chargeable:No
Is Pending:No
Is Cancelled:No
Is Component Type:No
PO Department:Water Maintenance
PO Supervisor:
Contractor:ServiceStream
Created By: [REDACTED]
Department:ServiceStream Water
Supervisor: [REDACTED]
Allocatee:
Task Status:WORK COMPLETE

SEW repair Outlook Road water main, dated 31 December 2024. Source: SEW FOI Request (2025, May 13) pp. 136-138.



Mornington Peninsula Shire Council

McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C30

Sent: Tuesday, 1 April 2025 8:42 AM
 Subject: Re: 6 View Point Road , McRae - 1107857.003

[External Email] This email was sent from outside the organisation – be cautious, particularly with links and attachments.

Hey mate,

Here's the break down of yesterday

- access organised through the contact given to us. [REDACTED], the owners son in law.
- he said on the phone to office staff that there's a temp fence up but you can go through it.
- no signage to say street is abandoned or condemned.
- no signage to say the council needs to be notified of anyone in the street.
- spoke with security guard at the bottom of the street who asked what we had to do when we pulled up. He didn't say anything about any exclusion zones or requirement to contact council. he let us proceed onto the property.
- [REDACTED] came to site, walked around the yard and out the back of the house and stayed on site until we left.
- all works were carried out in the front yard where the pcb is located per plans.

SEW re-lines sewer in front of 6 View Point Road. Source: SEW FOI Request (2025, June 6) pp. 127.



Mornington Peninsula Shire Council
 McCrae Landslide

SUPPORTING EVIDENCE

PSM5665-075R

Appendix C31

Appendix D

Select Site Photographs



Photo 1 - Seepage at XW Granite contact and partially saturated fills of headscarp (06/01/2025)



Photo 2 - Depth of flow in View Point Road stormwater (06/01/2025)



Photo 3 - 5 Prospect Hill Road LPOD (15/01/2025)



Photo 4 - 4 Prospect Hill Road seepage (15/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D1



Photo 5 - Coburn Avenue & Charlesworth Street intersection (15/01/2025)



Photo 6 - 34 Coburn Avenue (15/01/2025)



Photo 7 - 1 Prospect Hill Road (15/01/2025)



Photo 8 - 1 Prospect Hill Road (15/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D2



Photo 9 - MPSC excavation on Charlesworth Street (16/01/2025)

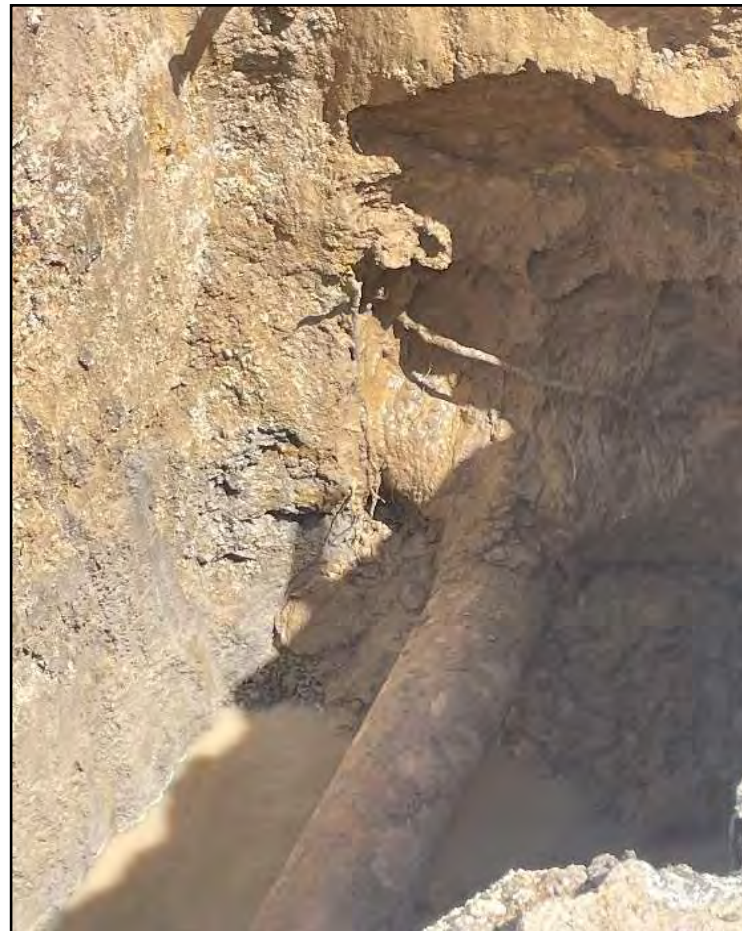


Photo 10 - MPSC excavation on Charlesworth Street (16/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D3



Photo 11A - Seepage line of Eastern flank (21/01/2025)



Photo 11B - Seepage line of Western flank (21/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D4



Photo 12A - SEW test pit on Charlesworth Street (24/01/2025)



Photo 12B - SEW test pit on Charlesworth Street (24/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D5



Photo 12C - Materials observed Charlesworth St (24/01/2025)

Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS



PSM5665-075R

Appendix D6



Photo 13 - Saturated soils immediately North-East of stairs on 10-12 View Point Road (24/01/2025)



Photo 14 - Saturated soils adjacent to retaining wall at stairs on 10-12 View Point Road (24/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D7



Photo 15A - Seepage line of Eastern flank (30/01/2025)



Photo 15B - Seepage line of Western flank (30/01/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D8



Photo 16 - Waller Place wet soils and rutting (30/01/2025)



Photo 17 - Sediment plume downstream of Outlook Road water main failure (30/01/2025)



Photo 18 - Inferred base flows in reserve near 44 The Boulevard (30/01/2025)



Photo 19 - Green dye from NDT01 (12/02/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D9



Photo 20 - Green dye from NDT01 (12/02/2025)



Photo 21 - NDT01 (17/02/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D10



Photo 22 - Green dye (17/02/2025)



Photo 23 - Green dye (17/02/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D11



Photo 24 - Saturated pipe adjacent to SEW water main failure on Outlook Road (21/02/2025)



Photo 25 - Sandy sediment plume inferred from Outlook Road Water Main Failure (21/02/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D12



Photo 26A - Seepage line of Eastern flank (28/02/2025)



Photo 26B - Seepage line of Western flank (28/02/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D13



Photo 27 - Red dye tracing of NDT02 (03/03/2025)



Photo 28 - Green dye (03/03/2025)



Photo 29 - Inferred sediment staining on trees on Outlook Road reserve (07/03/2025)



Photo 30- Seepage lines (07/03/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D14



Photo 31A - Seepage zone of Eastern flank (20/03/2025)



Photo 31B - Seepage line of Western flank (20/03/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D15



Photo 32 - Red dye tracing of Borehole BH01A (20/03/2025)



Photo 33A - Coburn Avenue creek invert near Waller Place (02/04/2025)



Photo 33B - Exposed XW Granite at invert of Coburn Avenue creek (02/04/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D16



Photo 34A - Seepage line of Eastern flank (10/04/2025)



Photo 34B - Seepage line of Western flank (10/04/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D17



Photo 35A - Seepage line of Eastern flank (20/05/2025)



Photo 35B - Seepage line of Western Flank (20/05/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation

SELECT SITE PHOTOGRAPHS

PSM5665-075R

Appendix D18



Photo 36A - Seepage line of Eastern Flank (16/06/2025)



Photo 36B - Seepage line of Western Flank (16/06/2025)



Mornington Peninsula Shire Council
McCrae Landslide - Causation



SELECT SITE PHOTOGRAPHS



PSM5665-075R

Appendix D19


Appendix E


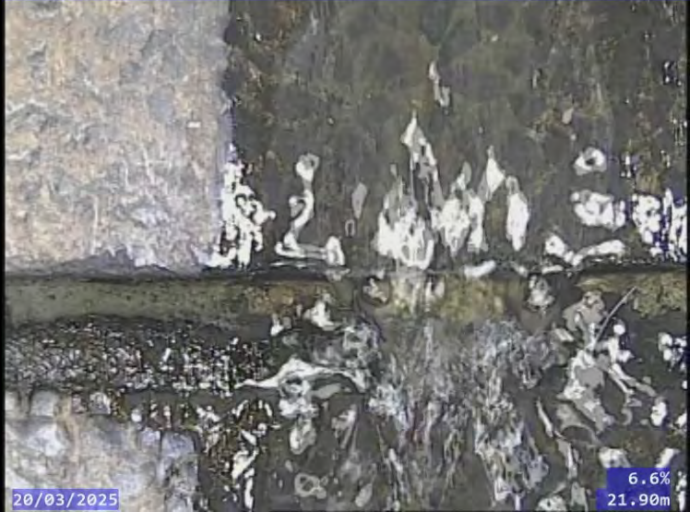
Stormwater defects

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|---|---|--|
| 1 | 1044313 | 600 | Intersection of Browne Street and Coburn Avenue | Joint displaced radially, radial displacement. Void visible through defect. |  |
| 2 | 548709 | 600 | Intersection of Browne Street and Coburn Avenue | Joint displaced radially, radial displacement. Soil visible through defect. |  |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|---|--|--|
| 3 | 548722 | 600 | 4 Waller Place | Joint displaced longitudinally. Soil visible through defect. | <div><div>PIT1.3 -> PIT1.2 3A WALLER PLACE MCCRAE</div><div>Concrete reinforced</div><div>600</div><div>8.2% 2.05m</div><div>20/03/2025</div></div>  |
| 4 | 1044313 | 600 | Intersection of Browne Street and Coburn Avenue | Joint displaced radially. Soil visible through defect. | <div><div>PIT1.1 -> PIT1.0 26 COBURN AVE MCCRAE</div><div>Concrete reinforced</div><div>600</div><div>5.3% 24.44m</div><div>20/03/2025</div></div>  |







| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|---|
| 5 | 1035993 | 600 | 26 Coburn Avenue | Hole in invert. Void visible through defect. |  |

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|--|--|--|
| 6 | 1036004 | 600 | Intersection of Coburn Avenue and Prospect Hill Road | Joint displaced longitudinally. Soil visible through defect. | <div><div>PIT1B7 -> PIT1B6 25 COBURN AVE MCCRAEConcrete reinforced600</div><div>20/03/20256.5%21.90m</div></div> <div><div>PIT1B7 -> PIT1B6 25 COBURN AVE MCCRAEConcrete reinforced600</div><div>20/03/20256.6%21.90m</div></div> |







| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|--|
| 7 | 1036005 | 600 | 22 Coburn Avenue | Joint displaced longitudinally. Soil visible through defect. |  |
| 8 | 1036005 | 600 | 12 Coburn Avenue | Hole at Joint. Soil visible through defect. |  |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|--|
| 9 | 570333 | 300 | 9 Browne Street | Circumferential cracking. Soil visible through defect. |  |
| 10 | 570332 | 300 | 11 Browne Street | Circumferential cracking. Soil visible through defect. |  |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|--|
| 11 | 570332 | 300 | 11 Browne Street | Circumferential cracking. Soil visible through defect. |  |
| 12 | 570331 | 300 | 15 Browne Street | Circumferential cracking. Soil visible through defect. |  |





| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|--|
| 13 | 570331 | 300 | 15 Browne Street | Circumferential cracking. Soil visible through defect. |  |
| 14 | 570331 | 300 | 17 Browne Street | Circumferential cracking. Soil visible through defect. |  |


| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|--|
| 15 | 570331 | 300 | 17 Browne Street | Circumferential cracking. Soil visible through defect. |  |
| 16 | 570331 | 300 | 17 Browne Street | Circumferential cracking. Soil visible through defect. |  |

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|-----------------------|--|--|
| 17 | 570331 | 300 | 17 & 19 Browne Street | Circumferential cracking. Soil visible through defect. |  |
| 18 | 570329 | 300 | 21 Browne Street | Circumferential cracking. Soil visible through defect. |  |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|--|--|--|
| 19 | 570329 | 300 | Corner of Browne Street and Corbens Lane | Circumferential cracking. Soil visible through defect. | <div><div>PIT1.4 -> PIT1.3 4 COBURN AVE MCCRAE</div><div>Concrete reinforced</div><div></div><div><div>24/03/2025</div><div>-9.8% 9.44m</div></div></div> |
| 20 | 570329 | 300 | Corner of Browne Street and Corbens Lane | Circumferential cracking. Soil visible through defect. | <div><div>PIT1.4 -> PIT1.3 4 COBURN AVE MCCRAE</div><div>Concrete reinforced</div><div></div><div><div>24/03/2025</div><div>-11.7% 11.83m</div></div></div> |





| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|--|--|--|
| 21 | 570329 | 300 | Corner of Browne Street and Corbens Lane | Circumferential cracking. Soil visible through defect. |  <p>PIT1.4 -> PIT1.3 4 COBURN AVE MCCRAE Concrete reinforced -6.2% 13.01m 24/03/2025</p> |
| 22 | 570339 | 300 | Corner of Coburn Avenue and Corbens Lane | Possible small hole in invert. |  <p>PIT1.1 -> PIT6.4 4 COBURN AVE MCCRAE Concrete reinforced General comment POSSIBLE SMALL HOLE IN INVERT -0.1% 0.13m 24/03/2025</p> |

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|--|--|--|
| 23 | 570338 | 300 | Corner of Coburn Avenue and Corbens Lane | Localised hole. Soil visible through defect. |  |
| 24 | 570337 | 300 | 2 Coburn Avenue | Circumferential cracking. Soil visible through defect. |  |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|---|---|
| 25 | 546872 | 300 | 1 Burrell Street | Radial displacement. Soil/void visible through defect at joint. | <div><div>PIT3 -> PIT2 1 BURRELL ST MCCRAE</div><div>Concrete reinforced</div><div>7.2% 3.81m</div></div>  |
| 26 | 546872 | 300 | 1 Burrell Street | Localised hole in wall. Soil/void visible through defect. | <div><div>PIT3 -> PIT2 1 BURRELL ST MCCRAE</div><div>Concrete reinforced</div><div>9.6% 5.99m</div></div>  |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|--|---|
| 27 | 927918 | 300 | 2 Burrell Street | Joint displaced radially. Soil/void visible through defect. | <div><div>PIT4 -> EW 2 BURRELL ST MCCRAE</div><div>Concrete reinforced</div><div></div><div>24/03/2025</div><div>-10.7% 1.60m</div></div> |
| 28 | 927918 | 300 | 2 Burrell Street | Joint displaced radially. Soil/void visible through defect at joint. | <div><div>PIT4 -> EW 2 BURRELL ST MCCRAE</div><div>Concrete reinforced</div><div></div><div>24/03/2025</div><div>-7.4% 3.79m</div></div> |



| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|------------------|---|------------|
| 29 | 927918 | 300 | 2 Burrell Street | Joint displaced radially. Soil/void visible through defect, at joint. | |
| 30 | 1114743 | 150 | 5 Waller Place | Localised hole in wall. Soil visible through defect. | |

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|--|--|------------|
| 31 | 908912 | 750 | Between 3A Waller Place & Mornington Peninsula Freeway | Localised hole in wall. Soil visible through defect. | |
| 32 | 908906 | 600 | Between Bayview Road & Mornington Peninsula Freeway | Localised hole in wall. Soil visible through defect. | |

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|---------------------------------------|---|------------|
| 33 | 908906 | 600 | Corner of Outlook Road / Bayview Road | Localised hole in wall. Soil visible through defect. | |
| 34 | 1062051 | 300 | 1/613 Point Nepean Road | Joint displaced angularly. Soil visible through defect. | |

| Defect ID | Asset ID | Pipe Diameter (mm) | Location | Defect Description | Photograph |
|-----------|----------|--------------------|-------------------------|---|------------|
| 35 | N/A | ? | Outlook Rd / Bayview Rd | Undocumented stormwater line, constant flow. Blockage reported by MPSC at approximately 3m East of pit. | |



Appendix F

Borehole log reports, DCP reports, slope observations and CPT interpretation

HA01

Page 1 of 1

Project No.: PSM5665

```
PSM 3.02.2 | B - MOD FOR 5665.GLB Log PSM AU NONCORE BH NZ AU PSM 5665.050.GPJ 02/07/2025 12:07 10 03 00 09 Datrol Fence and Map Tool | Lib: PSM 3.02.1 2019-03-06 Pri: PSM 3.02.1 2019-03-06
```




DYNAMIC CONE PENETROMETER TEST RESULTS

| | | | |
|--------------------|--|--------------------|-----------|
| Job No. | PSM5665 | Sheet | 1 of 1 |
| Project | McCrae Landslide | Date | 16-Jun-25 |
| Test Method | AS 1289.6.3.2. - 1997 <i>Methods of Testing Soils for Engineering Purposes - 9 kg Dynamic Cone Penetrometer Test</i> | Drop Height | 510 mm |
| Tested by | DRP | Hammer Mass | 9 kg |
| | | Tip Type | CONICAL |

| Test Depth LOCATION | DCP HA01 | Comments |
|------------------------|------------------|--|
| | HW | Hammer weight |
| 0.15 | 1 | |
| 0.25 | 1 | |
| 0.35 | 2 | |
| 0.40 | 4 | |
| 0.50 | 6 | |
| 0.60 | 7 | |
| 0.70 | 8 | |
| 0.80 | 8 | |
| 0.90 | 9 | |
| 1.00 | 8 | |
| 1.10 | 8 | |
| 1.20 | 8 | |
| 1.30 | 7 | |
| 1.40 | 7 | Augered out to 1.3m, re-start test from 1.3m |
| 1.50 | 4 | |
| 1.60 | 2 | |
| 1.70 | 3 | |
| 1.80 | 3 | |
| 1.90 | 5 | |
| 2.00 | 5 | |
| 2.10 | 13 | |
| 2.20 | 12 | |
| 2.30 | 6 | |
| 2.40 | 7 | |
| 2.50 | End of test 2.50 | |
| 2.60 | | |
| 2.70 | | |
| 2.80 | | |
| 2.90 | | |
| 3.00 | | |
| 3.10 | | |
| 3.20 | | |
| 3.30 | | |
| 3.40 | | |
| 3.50 | | |
| 3.60 | | |
| 3.70 | | |
| 3.80 | | |
| 3.90 | | |
| 4.00 | | |

Test Coordinates: E - 319565.1 N - 5753722.4

HA02

Geotechnical Log

Client: Mornington Peninsula Shire Council
Project Name: McCrae Landslide Geotechnical Investigation
Hole Location: 6 View Point Road - Backyard
Hole Position: 319566.2 m E 5753731.1 m N GDA2020 / MGA Zone 55

Commenced: 16/06/2025
Completed: 16/06/2025
Logged By: DRP
Checked By: DRP

Drill Model and Mounting: Hand Auger
Hole Diameter: 75 mm

Inclination: -90°
Bearing:


RL Surface: 30.20 m
Datum: AHD Operator: PSM

| Drilling Information | | | | | | | Soil Description | | | | | | | Observations |
|--|-------------|---------|--------------|-----------------------|---|--------|------------------|-------------|-----------------------|--|--------------------|--------------------------------|-----------------------------|--|
| Method | Penetration | Support | Water | Samples Tests Remarks | Recovery | RL (m) | Depth (m) | Graphic Log | Classification Symbol | Material Description | Moisture Condition | Consistency / Relative Density | Hand Penetrometer UCS (kPa) | Structure, Zoning, Origin, Additional Observations |
| HA | | N | Not Observed | D 0.00-0.20 m | | 29.2 | 1 | | CL | TOPSOIL: Sandy CLAY: low plasticity, dark brown; fine to coarse grained sand, with rootlets and bark. No organic material. | D | S | 100 | 0.00: TOPSOIL / Possibly FILL |
| | | | | CL | Sandy CLAY: low plasticity, dark brown; fine to coarse grained sand. | | | | St | 200 | | | | |
| | | | | SM | Silty SAND: medium to coarse grained, brown; silt low plasticity, trace gravel fine grained, sub-angular. | | | | MD - D | 300 | | | | |
| | | | | D 0.60-0.80 m | | | | | | | | | 400 | 1.00: Possibly COLLUVIUM |
| | | | | D 1.00-1.30 m | | | | | | | | | 500 | |
| | | | | | | | | | | | | | | |
| Hole Terminated at 1.30 m Target depth | | | | | | | | | | | | | | |
| | | | | | | 28.2 | 2 | | | | | | | |
| | | | | | | 27.2 | 3 | | | | | | | |
| | | | | | | 26.2 | 4 | | | | | | | |

Method

AD/T - Auger drilling TC bit
AD/V - Auger drilling V bit
WB - Washbore
SPT - Standard penetration test
PT - Push tube
AS - Auger screwing
CS - Continuous sampling (DT22)
NDD - Non destructive drilling
CC - Concrete coring

Penetration



No resistance

Refusal

Water

- ▷ Inflow
- ▷ Partial Loss
- ◼ Complete Loss

Samples and Tests

- U - Undisturbed Sample
- D - Disturbed Sample
- SPT - Standard Penetration Test
- ES - Environmental Sample
- TW - Thin Walled
- LB - Large Disturbed Sample

Moisture Condition
D - Dry
M - Moist
W - Wet

Consistency/Relative Density

| | |
|-----|----------------|
| VS | - Very soft |
| S | - Soft |
| F | - Firm |
| St | - Stiff |
| VSt | - Very stiff |
| H | - Hard |
| VL | - Very loose |
| L | - Loose |
| MD | - Medium dense |
| D | - Dense |
| VD | - Very dense |
| Ce | - Cemented |
| C | - Compact |

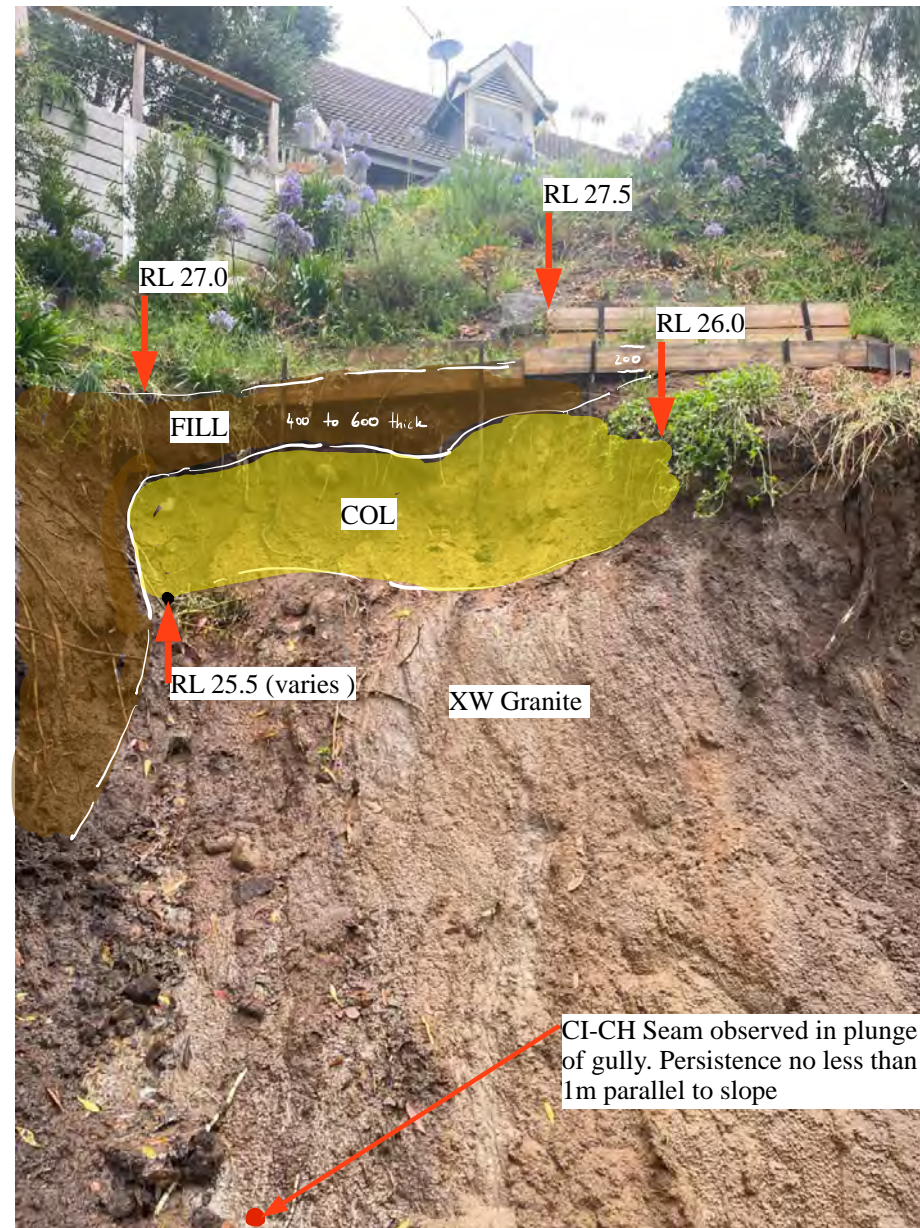


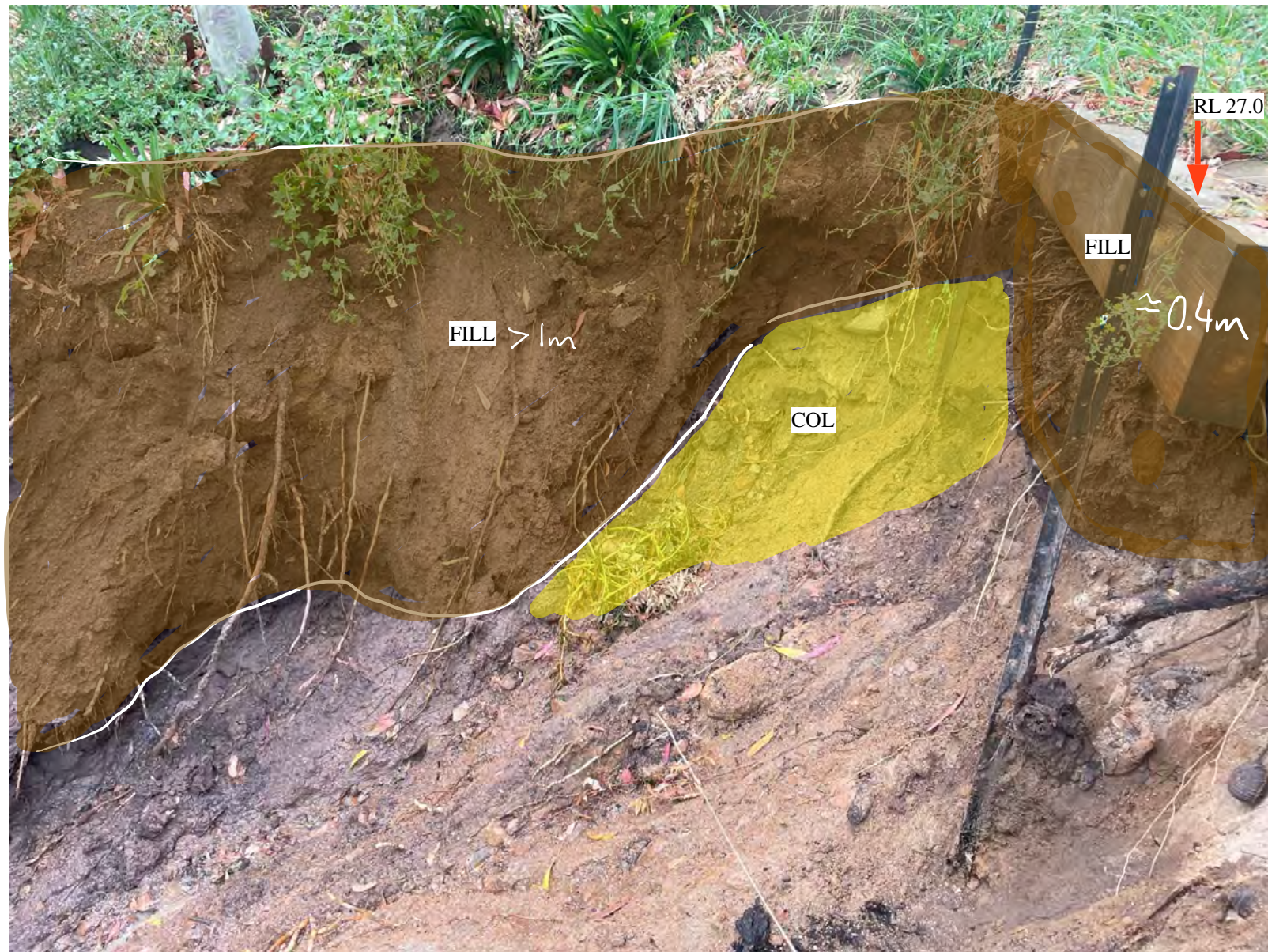
DYNAMIC CONE PENETROMETER TEST RESULTS

| | | | |
|--------------------|--|--------------------|-----------|
| Job No. | PSM5665 | Sheet | 1 of 1 |
| Project | McCrae Landslide | Date | 16-Jun-25 |
| Test Method | AS 1289.6.3.2. - 1997 <i>Methods of Testing Soils for Engineering Purposes - 9 kg Dynamic Cone Penetrometer Test</i> | Drop Height | 510 mm |
| Tested by | DRP | Hammer Mass | 9 kg |
| | | Tip Type | CONICAL |

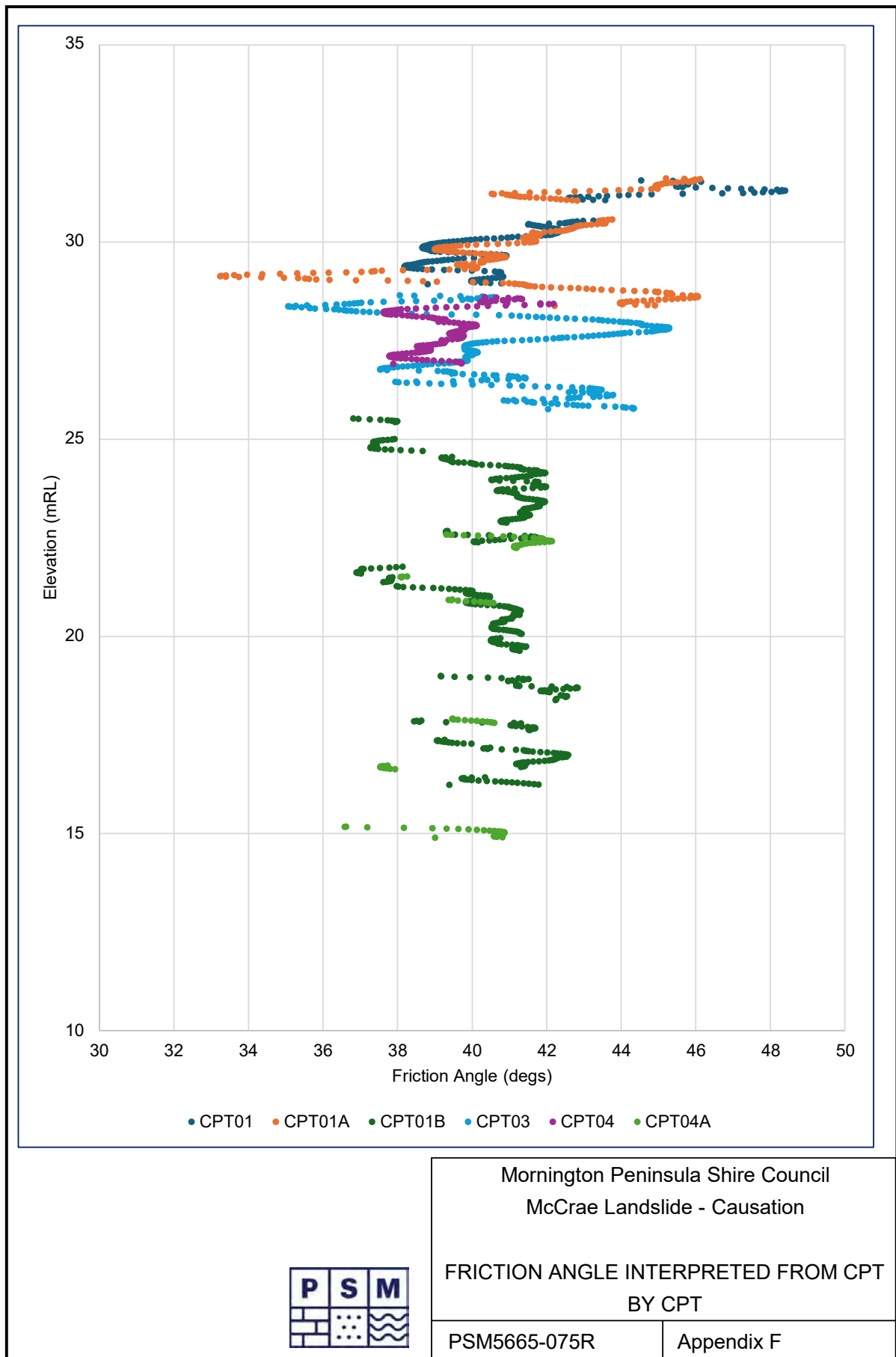
| Test Depth LOCATION | DCP HA02 | Comments |
|------------------------|------------------|-----------------------|
| 0.10 | 1 | |
| 0.20 | 2 | |
| 0.30 | 1 | |
| 0.40 | 1 | |
| 0.50 | 2 | |
| 0.60 | 4 | |
| 0.70 | 15 | |
| 0.80 | 15 / 50mm | Refusal at 0.75 |
| 0.90 | - | |
| 1.00 | 7 | Re-start test at 0.90 |
| 1.10 | 12 | |
| 1.20 | 10 / 50mm | Refusal at 1.15 |
| 1.30 | End of test 1.15 | |
| 1.40 | | |
| 1.50 | | |
| 1.60 | | |
| 1.70 | | |
| 1.80 | | |
| 1.90 | | |
| 2.00 | | |
| 2.10 | | |
| 2.20 | | |
| 2.30 | | |
| 2.40 | | |
| 2.50 | | |
| 2.60 | | |
| 2.70 | | |
| 2.80 | | |
| 2.90 | | |
| 3.00 | | |
| 3.10 | | |
| 3.20 | | |
| 3.30 | | |
| 3.40 | | |
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| 3.70 | | |
| 3.80 | | |
| 3.90 | | |
| 4.00 | | |

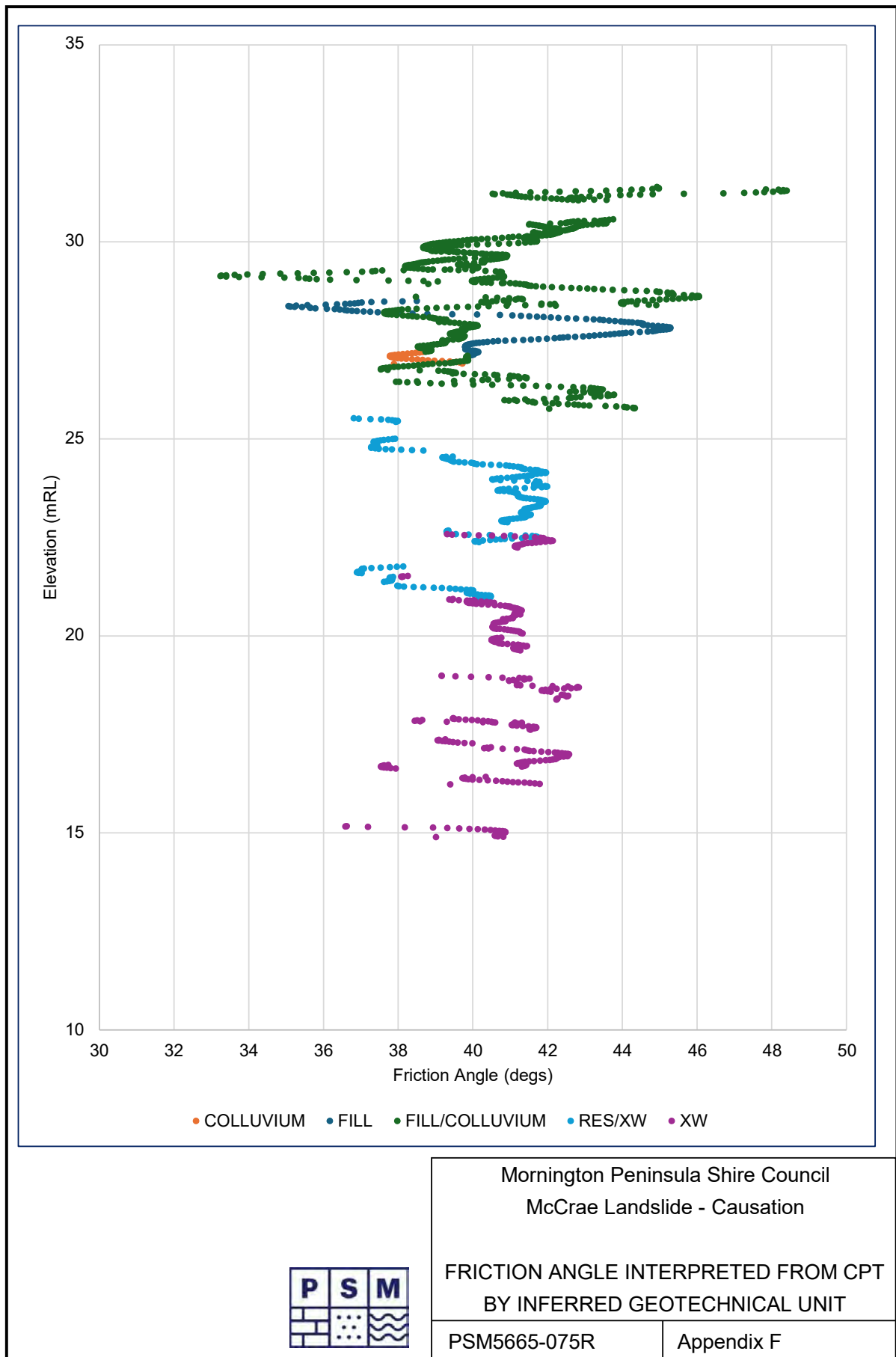
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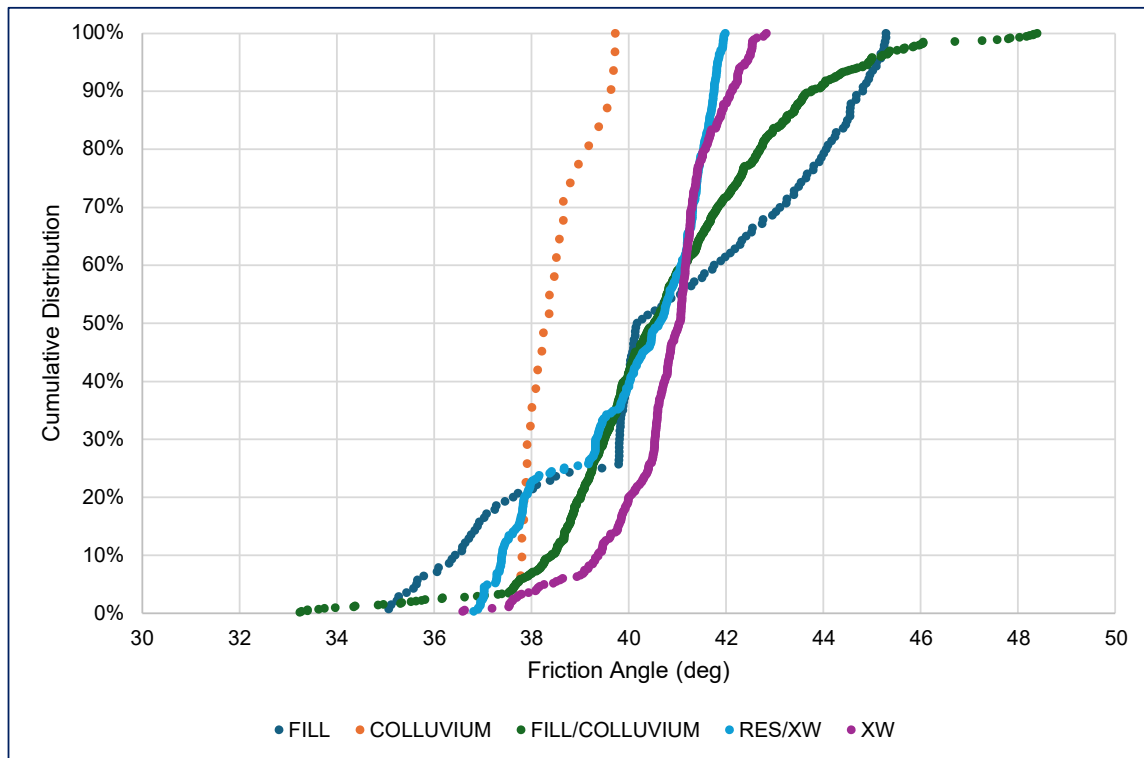












Mornington Peninsula Shire Council
McCrae Landslide - Causation

FRICITION ANGLE INTERPRETED FROM CPT
CUMULATIVE DISTRIBUTION

PSM5665-075R

Appendix F



Appendix G

Laboratory Test Certificates

Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S1
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 26/06/2025
Sampling Method: Sampled by Client - Tested as Received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025. Material classified as per AS 1726:2017

Site Selection: Selected by Client

Sample Location: HA01, Depth: 0.08m - 0.38m

Material: ML - sandy SILT, trace gravel, brown, low plasticity, sand 51% fine to coarse grained, gravel 2%



C & T Geotechnical (South West)

8 Freedman Street North Geelong Vic 3215

Phone: (03) 5282 1566

Email: Chrism@ctgeotechsw.com.au

Accredited for compliance with ISO/IEC 17025 - Testing



Irrelevant & Sensitive

Approved Signatory: Chris Mamalis

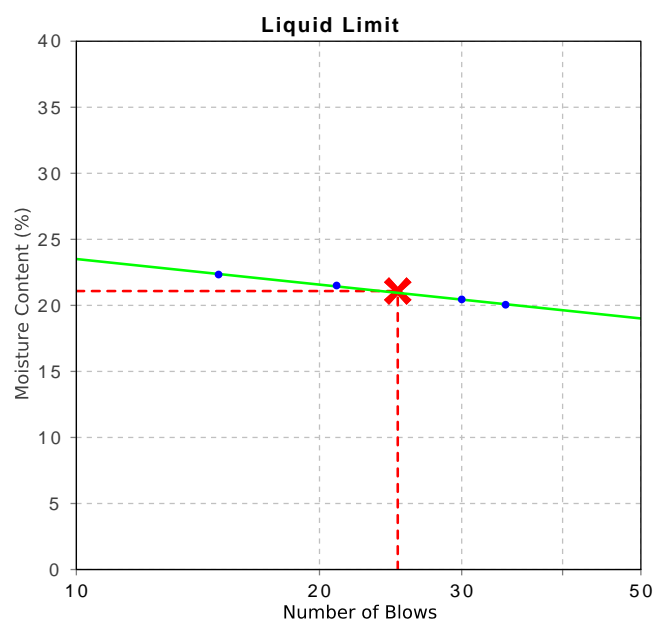
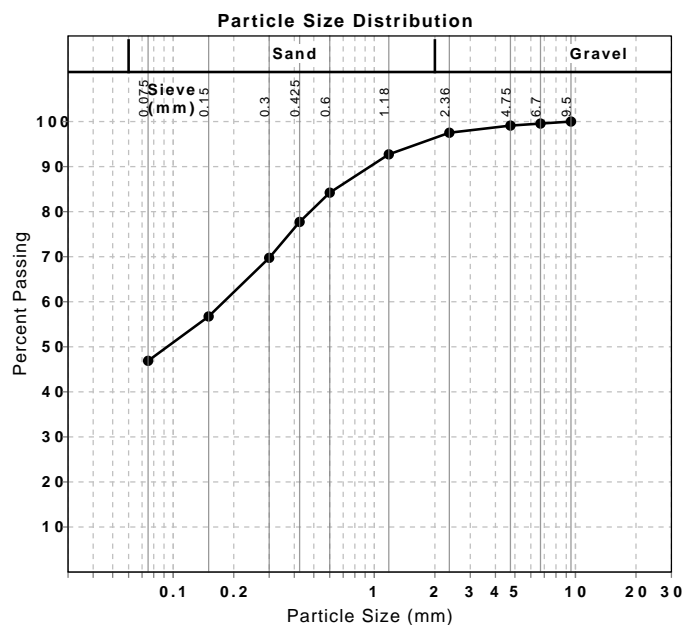
NATA Accredited Laboratory Number: 20109

| Particle Size Distribution (AS1289 3.6.1) | | | | |
|---|----------|----------------|------------|-----------------|
| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
| 9.5 mm | 100 | | 0 | |
| 6.7 mm | 100 | | 0 | |
| 4.75 mm | 99 | | 0 | |
| 2.36 mm | 98 | | 2 | |
| 1.18 mm | 93 | | 5 | |
| 0.6 mm | 84 | | 9 | |
| 0.425 mm | 78 | | 6 | |
| 0.3 mm | 70 | | 8 | |
| 0.15 mm | 57 | | 13 | |
| 0.075 mm | 47 | | 10 | |

| Atterberg Limit (AS1289 3.1.1 & 3.2.1 & 3.3.1) | | Min | Max |
|--|------------|-----|-----|
| Sample History | Oven Dried | | |
| Preparation Method | Dry Sieve | | |
| Liquid Limit (%) | 21 | | |
| Plastic Limit (%) | 19 | | |
| Plasticity Index (%) | 2 | | |

| Linear Shrinkage (AS1289 3.4.1) | | Min | Max |
|----------------------------------|---------------|-----|-----|
| Moisture Condition Determined By | AS 1289.3.1.1 | | |
| Linear Shrinkage (%) | 1.0 | | |
| Cracking Crumbling Curling | Cracking | | |

| Moisture Content (AS 1289 2.1.1) | | Min | Max |
|----------------------------------|------|-----|-----|
| Moisture Content (%) | 16.0 | | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S2
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 26/06/2025
Sampling Method: Sampled by Client - Tested as Received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025. Material classified as per AS 1726:2017

Site Selection: Selected by Client

Sample Location: HA01, Depth: 0.5m - 0.9m

Material: ML - sandy SILT, trace gravel, brown, non-plastic, sand 59% fine to coarse grained, gravel 4%.



C & T Geotechnical (South West)

8 Freedman Street North Geelong Vic 3215

Phone: (03) 5282 1566

Email: Chrism@ctgeotechsw.com.au

Accredited for compliance with ISO/IEC 17025 - Testing



Irrelevant & Sensitive

Approved Signatory: Chris Mamalis

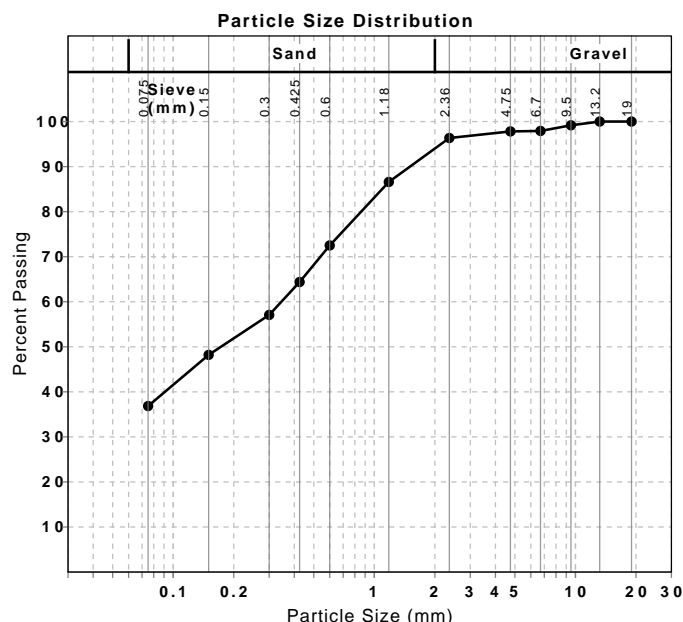
NATA Accredited Laboratory Number: 20109

| Particle Size Distribution (AS1289 3.6.1) | | | | | |
|---|----------|----------------|------------|-----------------|--|
| Sieve | Passed % | Passing Limits | Retained % | Retained Limits | |
| 19 mm | 100 | | 0 | | |
| 13.2 mm | 100 | | 0 | | |
| 9.5 mm | 99 | | 1 | | |
| 6.7 mm | 98 | | 1 | | |
| 4.75 mm | 98 | | 0 | | |
| 2.36 mm | 96 | | 1 | | |
| 1.18 mm | 87 | | 10 | | |
| 0.6 mm | 72 | | 14 | | |
| 0.425 mm | 64 | | 8 | | |
| 0.3 mm | 57 | | 7 | | |
| 0.15 mm | 48 | | 9 | | |
| 0.075 mm | 37 | | 11 | | |

| Atterberg Limit (AS1289 3.1.1 & 3.2.1 & 3.3.1) | | Min | Max |
|--|----------------|-----|-----|
| Sample History | Oven Dried | | |
| Preparation Method | Dry Sieve | | |
| Liquid Limit (%) | Not Obtainable | | |
| Plastic Limit (%) | Not Obtainable | | |
| Plasticity Index (%) | Non Plastic | | |

| Linear Shrinkage (AS1289 3.4.1) | | Min | Max |
|----------------------------------|---------------|-----|-----|
| Moisture Condition Determined By | AS 1289.3.1.1 | | |
| Linear Shrinkage (%) | 0.0 | | |
| Cracking Crumbling Curling | None | | |

| Moisture Content (AS 1289 2.1.1) | | Min | Max |
|----------------------------------|-----|-----|-----|
| Moisture Content (%) | 8.5 | | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S3
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 24/06/2025
Sampling Method: Sampled by Client - Tested as Received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025.

Site Selection: Selected by Client

Sample Location: HA01, Depth: 0.9m - 1.45m

Material: silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 9% fine.



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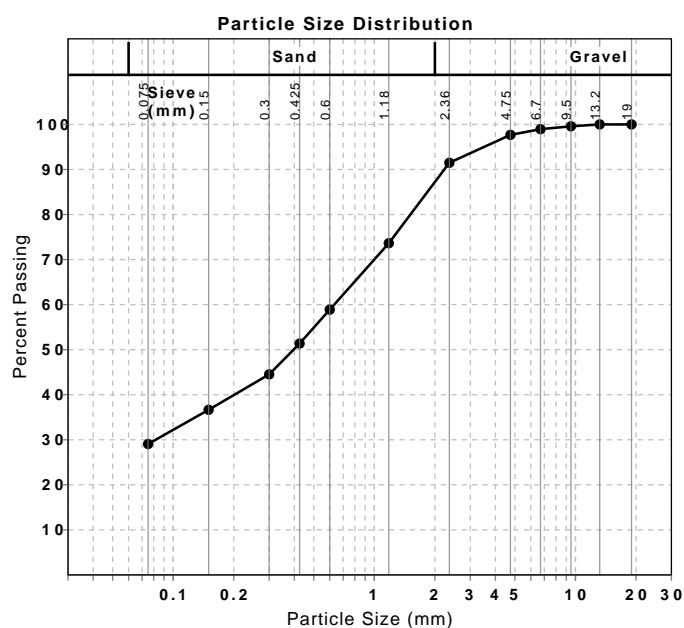
Approved Signatory: Chris Mamalis

NATA Accredited Laboratory Number: 20109

Particle Size Distribution (AS1289 3.6.1)

| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
|----------|----------|----------------|------------|-----------------|
| 13.2 mm | 100 | | 0 | |
| 9.5 mm | 100 | | 0 | |
| 6.7 mm | 99 | | 1 | |
| 4.75 mm | 98 | | 1 | |
| 2.36 mm | 91 | | 6 | |
| 1.18 mm | 74 | | 18 | |
| 0.6 mm | 59 | | 15 | |
| 0.425 mm | 51 | | 8 | |
| 0.3 mm | 45 | | 7 | |
| 0.15 mm | 37 | | 8 | |
| 0.075 mm | 29 | | 8 | |

| Moisture Content (AS 1289 2.1.1) | Min | Max |
|----------------------------------|-----|-----|
| Moisture Content (%) | 6.5 | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S4
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 26/06/2025
Sampling Method: Sampled by Client - Tested as Received
The results apply to the sample as received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025. Material classified as per AS 1726:2017

Site Selection: Selected by Client

Sample Location: HA01, Depth: 1.45m - 2.0m

Material: SM - silty SAND, trace gravel, brown, fine to coarse grained, non-plastic, gravel 10% fine.



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Approved Signatory: Chris Mamalis

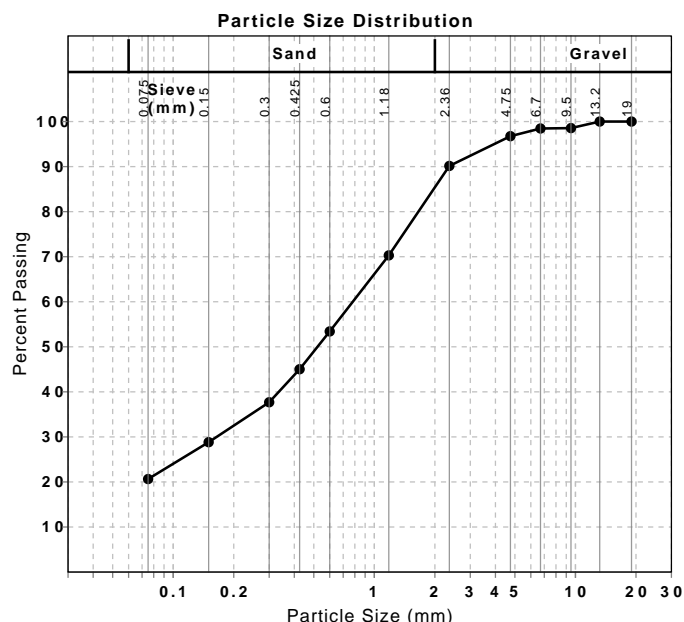
NATA Accredited Laboratory Number: 20109

| Particle Size Distribution (AS1289 3.6.1) | | | | | |
|---|----------|----------------|------------|-----------------|--|
| Sieve | Passed % | Passing Limits | Retained % | Retained Limits | |
| 19 mm | 100 | | 0 | | |
| 13.2 mm | 100 | | 0 | | |
| 9.5 mm | 99 | | 1 | | |
| 6.7 mm | 98 | | 0 | | |
| 4.75 mm | 97 | | 2 | | |
| 2.36 mm | 90 | | 7 | | |
| 1.18 mm | 70 | | 20 | | |
| 0.6 mm | 53 | | 17 | | |
| 0.425 mm | 45 | | 8 | | |
| 0.3 mm | 38 | | 7 | | |
| 0.15 mm | 29 | | 9 | | |
| 0.075 mm | 21 | | 8 | | |

| Atterberg Limit (AS1289 3.1.1 & 3.2.1 & 3.3.1) | | Min | Max |
|--|----------------|-----|-----|
| Sample History | Oven Dried | | |
| Preparation Method | Dry Sieve | | |
| Liquid Limit (%) | Not Obtainable | | |
| Plastic Limit (%) | Not Obtainable | | |
| Plasticity Index (%) | Non Plastic | | |

| Linear Shrinkage (AS1289 3.4.1) | | Min | Max |
|----------------------------------|---------------|-----|-----|
| Moisture Condition Determined By | AS 1289.3.1.1 | | |
| Linear Shrinkage (%) | 0.0 | | |
| Cracking Crumbling Curling | None | | |

| Moisture Content (AS 1289 2.1.1) | | Min | Max |
|----------------------------------|-----|-----|-----|
| Moisture Content (%) | 6.4 | | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S5
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 24/06/2025
Sampling Method: Sampled by Client - Tested as Received
The results apply to the sample as received
Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025.
Site Selection: Selected by Client
Sample Location: HA01, Depth: 2.1m - 2.3m
Material: silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 2%.



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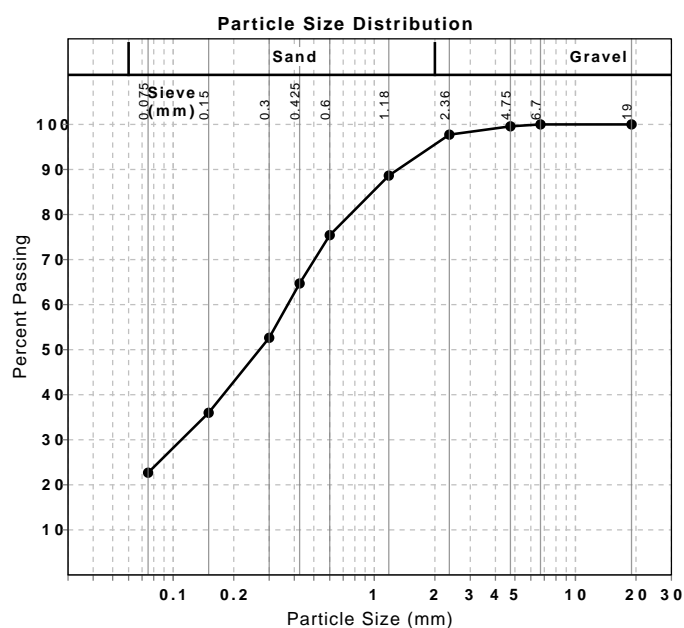
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Approved Signatory: Chris Mamalis
 NATA Accredited Laboratory Number: 20109

| Particle Size Distribution (AS1289 3.6.1) | | | | |
|---|----------|----------------|------------|-----------------|
| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
| 6.7 mm | 100 | | 0 | |
| 4.75 mm | 100 | | 0 | |
| 2.36 mm | 98 | | 2 | |
| 1.18 mm | 89 | | 9 | |
| 0.6 mm | 75 | | 13 | |
| 0.425 mm | 65 | | 11 | |
| 0.3 mm | 53 | | 12 | |
| 0.15 mm | 36 | | 17 | |
| 0.075 mm | 23 | | 13 | |
| Moisture Content (AS 1289 2.1.1) | | | | |
| | | | Min | Max |
| Moisture Content (%) | | | 10.1 | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S6
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 24/06/2025
Sampling Method: Sampled by Client - Tested as Received
The results apply to the sample as received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025.
Site Selection: Selected by Client
Sample Location: HA01, Depth: 2.3m - 2.4m
Material: silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 15% fine to medium.



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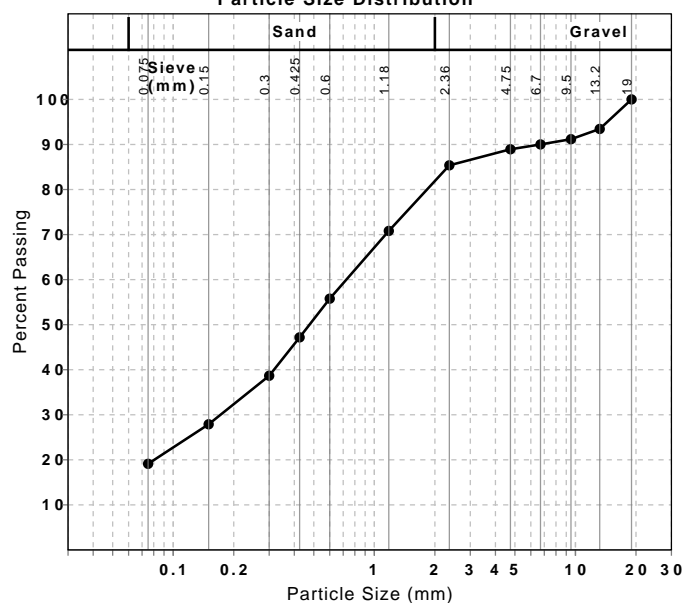
Approved Signatory: Chris Mamalis
 NATA Accredited Laboratory Number: 20109

Particle Size Distribution (AS1289 3.6.1)

| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
|----------|----------|----------------|------------|-----------------|
| 19 mm | 100 | | 0 | |
| 13.2 mm | 93 | | 7 | |
| 9.5 mm | 91 | | 2 | |
| 6.7 mm | 90 | | 1 | |
| 4.75 mm | 89 | | 1 | |
| 2.36 mm | 85 | | 4 | |
| 1.18 mm | 71 | | 15 | |
| 0.6 mm | 56 | | 15 | |
| 0.425 mm | 47 | | 9 | |
| 0.3 mm | 39 | | 9 | |
| 0.15 mm | 28 | | 11 | |
| 0.075 mm | 19 | | 9 | |

| Moisture Content (AS 1289 2.1.1) | Min | Max |
|----------------------------------|-----|-----|
| Moisture Content (%) | 8.6 | |

Particle Size Distribution



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S7
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 26/06/2025
Sampling Method: Sampled by Client - Tested as Received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025. Material classified as per AS 1726:2017

Site Selection: Selected by Client

Sample Location: HA02, Depth: 0.0m - 0.2m

Material: CL - ML - sandy CLAY-SILT, trace gravel, brown, low plasticity, sand 53% fine to coarse grained, gravel 5%



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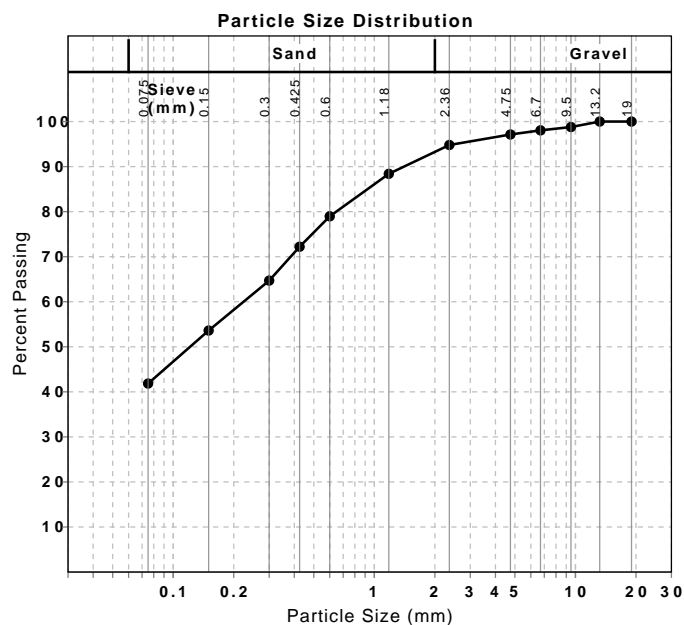
NATA Accredited Laboratory Number: 20109

| Particle Size Distribution (AS1289 3.6.1) | | | | |
|---|----------|----------------|------------|-----------------|
| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
| 19 mm | 100 | | 0 | |
| 13.2 mm | 100 | | 0 | |
| 9.5 mm | 99 | | 1 | |
| 6.7 mm | 98 | | 1 | |
| 4.75 mm | 97 | | 1 | |
| 2.36 mm | 95 | | 2 | |
| 1.18 mm | 88 | | 6 | |
| 0.6 mm | 79 | | 9 | |
| 0.425 mm | 72 | | 7 | |
| 0.3 mm | 65 | | 8 | |
| 0.15 mm | 54 | | 11 | |
| 0.075 mm | 42 | | 12 | |

| Atterberg Limit (AS1289 3.1.1 & 3.2.1 & 3.3.1) | | Min | Max |
|--|------------|-----|-----|
| Sample History | Oven Dried | | |
| Preparation Method | Dry Sieve | | |
| Liquid Limit (%) | 23 | | |
| Plastic Limit (%) | 18 | | |
| Plasticity Index (%) | 5 | | |

| Linear Shrinkage (AS1289 3.4.1) | | Min | Max |
|----------------------------------|---------------|-----|-----|
| Moisture Condition Determined By | AS 1289.3.1.1 | | |
| Linear Shrinkage (%) | 1.5 | | |
| Cracking Crumbling Curling | Cracking | | |

| Moisture Content (AS 1289 2.1.1) | | Min | Max |
|----------------------------------|-----|-----|-----|
| Moisture Content (%) | 8.5 | | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S8
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 24/06/2025
Sampling Method: Sampled by Client - Tested as Received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025.
Site Selection: Selected by Client
Sample Location: HA02, Depth: 0.6m - 0.8m
Material: sandy CLAY-SILT, trace gravel, brown, low plasticity, sand 57% fine to coarse grained, gravel 1%.



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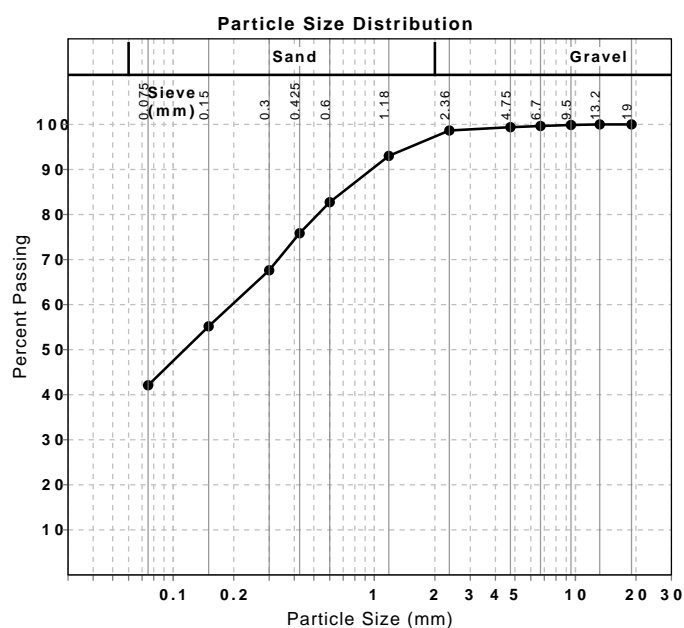
Irrelevant & Sensitive

Approved Signatory: Chris Mamalis
 NATA Accredited Laboratory Number: 20109

Particle Size Distribution (AS1289 3.6.1)

| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
|----------|----------|----------------|------------|-----------------|
| 13.2 mm | 100 | | 0 | |
| 9.5 mm | 100 | | 0 | |
| 6.7 mm | 100 | | 0 | |
| 4.75 mm | 99 | | 0 | |
| 2.36 mm | 99 | | 1 | |
| 1.18 mm | 93 | | 6 | |
| 0.6 mm | 83 | | 10 | |
| 0.425 mm | 76 | | 7 | |
| 0.3 mm | 68 | | 8 | |
| 0.15 mm | 55 | | 12 | |
| 0.075 mm | 42 | | 13 | |

| Moisture Content (AS 1289 2.1.1) | Min | Max |
|----------------------------------|-----|-----|
| Moisture Content (%) | 4.6 | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Sample Number: 2496-S9
Date Sampled: 16/06/2025
Dates Tested: 18/06/2025 - 24/06/2025
Sampling Method: Sampled by Client - Tested as Received

Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025.
Site Selection: Selected by Client
Sample Location: HA02, Depth: 1.0m - 1.3m
Material: silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 4%.



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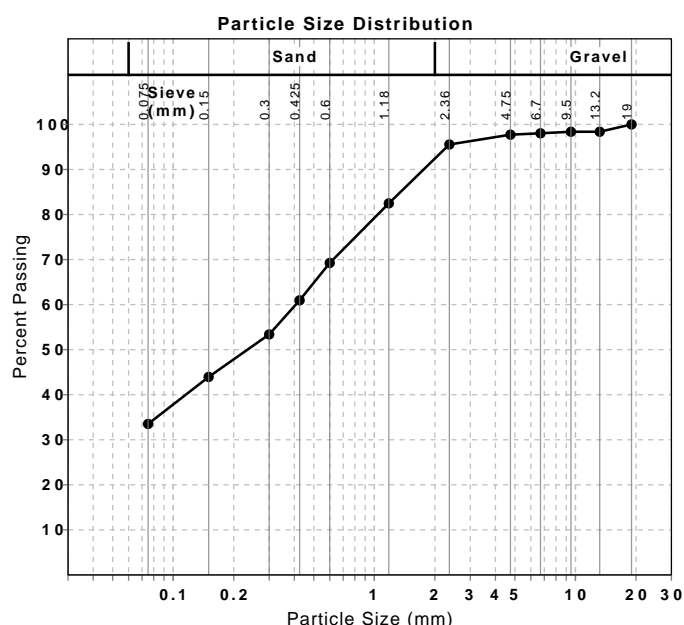
Irrelevant & Sensitive

Approved Signatory: Chris Mamalis
 NATA Accredited Laboratory Number: 20109

Particle Size Distribution (AS1289 3.6.1)

| Sieve | Passed % | Passing Limits | Retained % | Retained Limits |
|----------|----------|----------------|------------|-----------------|
| 19 mm | 100 | | 0 | |
| 13.2 mm | 98 | | 2 | |
| 9.5 mm | 98 | | 0 | |
| 6.7 mm | 98 | | 0 | |
| 4.75 mm | 98 | | 0 | |
| 2.36 mm | 96 | | 2 | |
| 1.18 mm | 82 | | 13 | |
| 0.6 mm | 69 | | 13 | |
| 0.425 mm | 61 | | 8 | |
| 0.3 mm | 53 | | 8 | |
| 0.15 mm | 44 | | 9 | |
| 0.075 mm | 34 | | 10 | |

| Moisture Content (AS 1289 2.1.1) | Min | Max |
|----------------------------------|-----|-----|
| Moisture Content (%) | 3.1 | |



Material Test Report

Report Number: GSSW2496-1
Issue Number: 2 - This version supersedes all previous issues
Reissue Reason: Project location amended as per clients request
Date Issued: 01/07/2025
Client: PELLIS SULLIVAN MEYNINK (PSM)

Contact: Dane Pope
Project Number: GSSW2496
Project Name: MCCRAE
Project Location: 6 VIEW POINT ROAD
Client Reference: PSM5665
Work Request: 23781
Dates Tested: 18/06/2025 - 19/06/2025
Sampling Method: Sampled by Client - Tested as Received
The results apply to the sample as received
Remarks: This report replaces GSSW2496 Issue 1 dated 27/06/2025.



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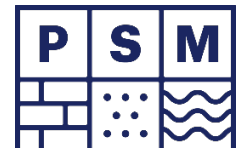
Moisture Content AS 1289 2.1.1

| Sample Number | Sample Location | Moisture Content (%) | Min | Max | Material |
|---------------|----------------------------|----------------------|-----|-----|--|
| 2496-S1 | HA01, Depth: 0.08m - 0.38m | 16.0 % | ** | ** | ML - sandy SILT, trace gravel, brown, low plasticity, sand 51% fine to coarse grained, gravel 2% |
| 2496-S2 | HA01, Depth: 0.5m - 0.9m | 8.5 % | ** | ** | ML - sandy SILT, trace gravel, brown, non-plastic, sand 59% fine to coarse grained, gravel 4%. |
| 2496-S3 | HA01, Depth: 0.9m - 1.45m | 6.5 % | ** | ** | silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 9% fine. |
| 2496-S4 | HA01, Depth: 1.45m - 2.0m | 6.4 % | ** | ** | SM - silty SAND, trace gravel, brown, fine to coarse grained, non-plastic, gravel 10% fine. |
| 2496-S5 | HA01, Depth: 2.1m - 2.3m | 10.1 % | ** | ** | silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 2%. |
| 2496-S6 | HA01, Depth: 2.3m - 2.4m | 8.6 % | ** | ** | silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 15% fine to medium. |
| 2496-S7 | HA02, Depth: 0.0m - 0.2m | 8.5 % | ** | ** | CL - ML - sandy CLAY-SILT, trace gravel, brown, low plasticity, sand 53% fine to coarse grained, gravel 5% |
| 2496-S8 | HA02, Depth: 0.6m - 0.8m | 4.6 % | ** | ** | sandy CLAY-SILT, trace gravel, brown, low plasticity, sand 57% fine to coarse grained, gravel 1%. |
| 2496-S9 | HA02, Depth: 1.0m - 1.3m | 3.1 % | ** | ** | silty SAND, trace gravel, brown, fine to coarse grained, low plasticity, gravel 4%. |

Appendix H

Pointerra Reality Model – RW Measurements

2024 Retaining Wall

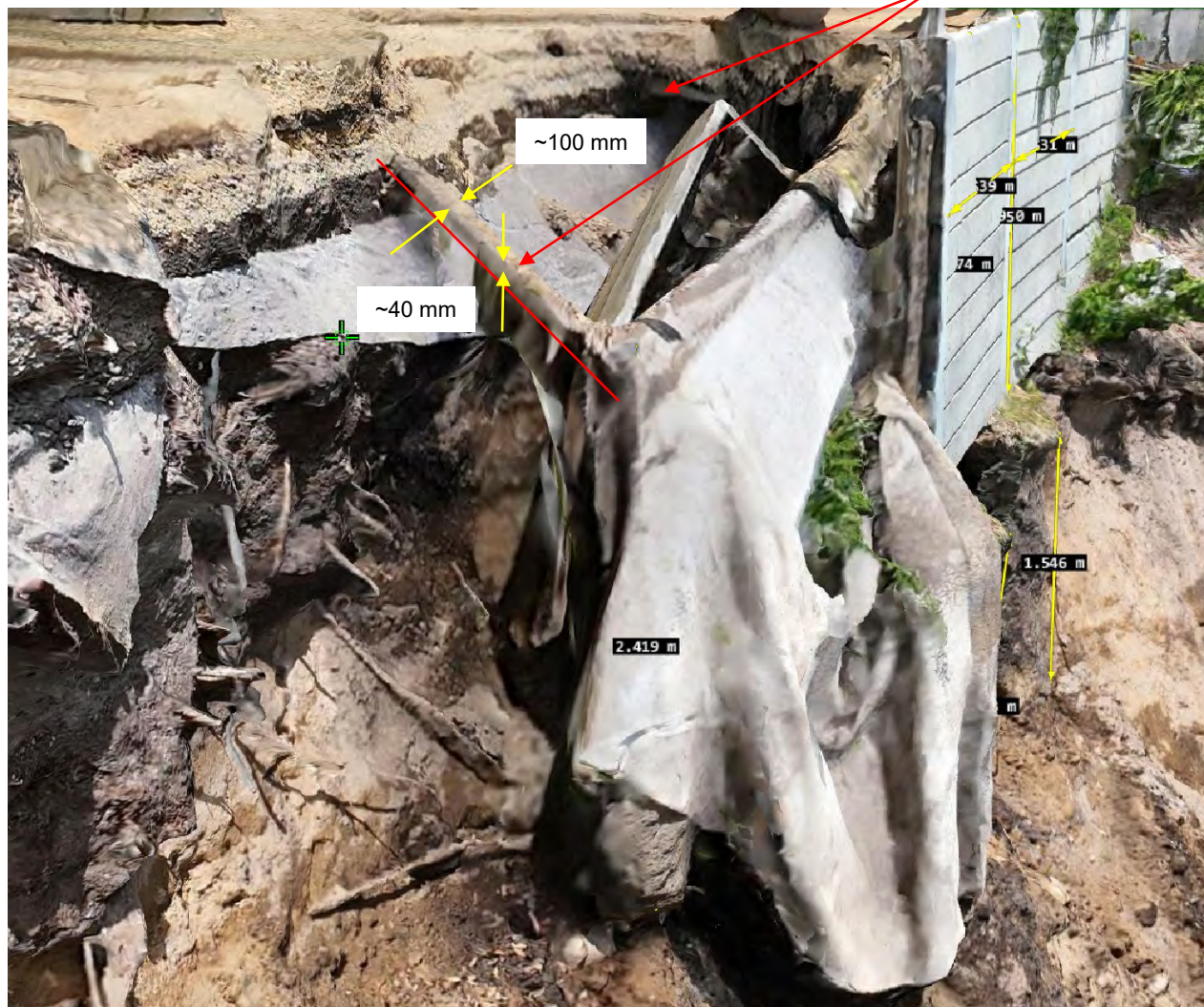


2024 Retaining Wall

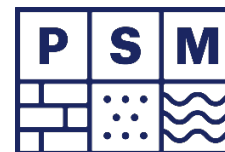


2022 Retaining wall and tie backs

Channel section tie backs



2022 Retaining wall and tie backs



2022 Planter boxes

Western side of planter box – 2.7 m long



Galvanised planters: 0.75 diameter x 0.4 high



2024 Geotextiles & levels



Seepage on 16/01/2025



COMPUTATIONS



Job No. PSM 5665

Sheet 1 of 2

Project McCrae Landslide - Causation

This computation estimates the nominal weld capacity of the 2022 RW uprights and tiebacks weld connection in tension.

It is estimated that:

* The channel sections are 100mm wide by 40mm deep RHS.

It is assumed that:

* The channel is 4mm thick which is a typically available thickness for 100mm by 40mm RHS channels.

* The connection is welded to the top and bottom of the channel along the width.

* The weld is a fillet weld.

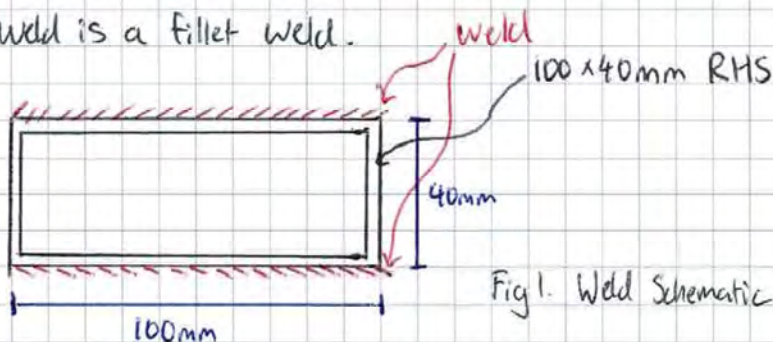


Fig 1. Weld Schematic

To AS4100 9.6.3.10 the nominal capacity of a fillet weld per unit length (V_w) is calculated by:

$$V_w = 0.6 f_{uw} t_e k_r$$

Where:

f_{uw} is the nominal tensile capacity of the weld metal

t_e is the throat thickness

k_r is a reduction factor for welded lap connection

f_{uw} is assumed to be 430 MPa.

By: SD

Date: 16/07/25

COMPUTATIONS



Job No. PSM 5665

Sheet 2 of 2

Project McCrae Landslide - Causation

Assuming equal leg fillet for thicknesses less than 6mm to AS4100 9.6.3.3 the fillet weld along an edge shall be the material thickness. In this case $t_w = 2.8\text{mm}$ (Fig 2)

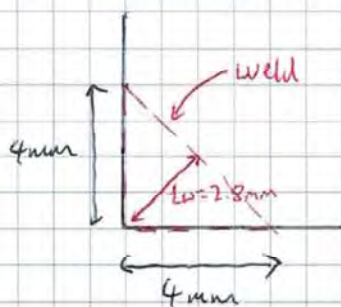


Fig 2. Fillet schematic

For the assumed weld length of 200mm (l_w) $R_f = 1.0$ (Table 9.6.3.1b B).

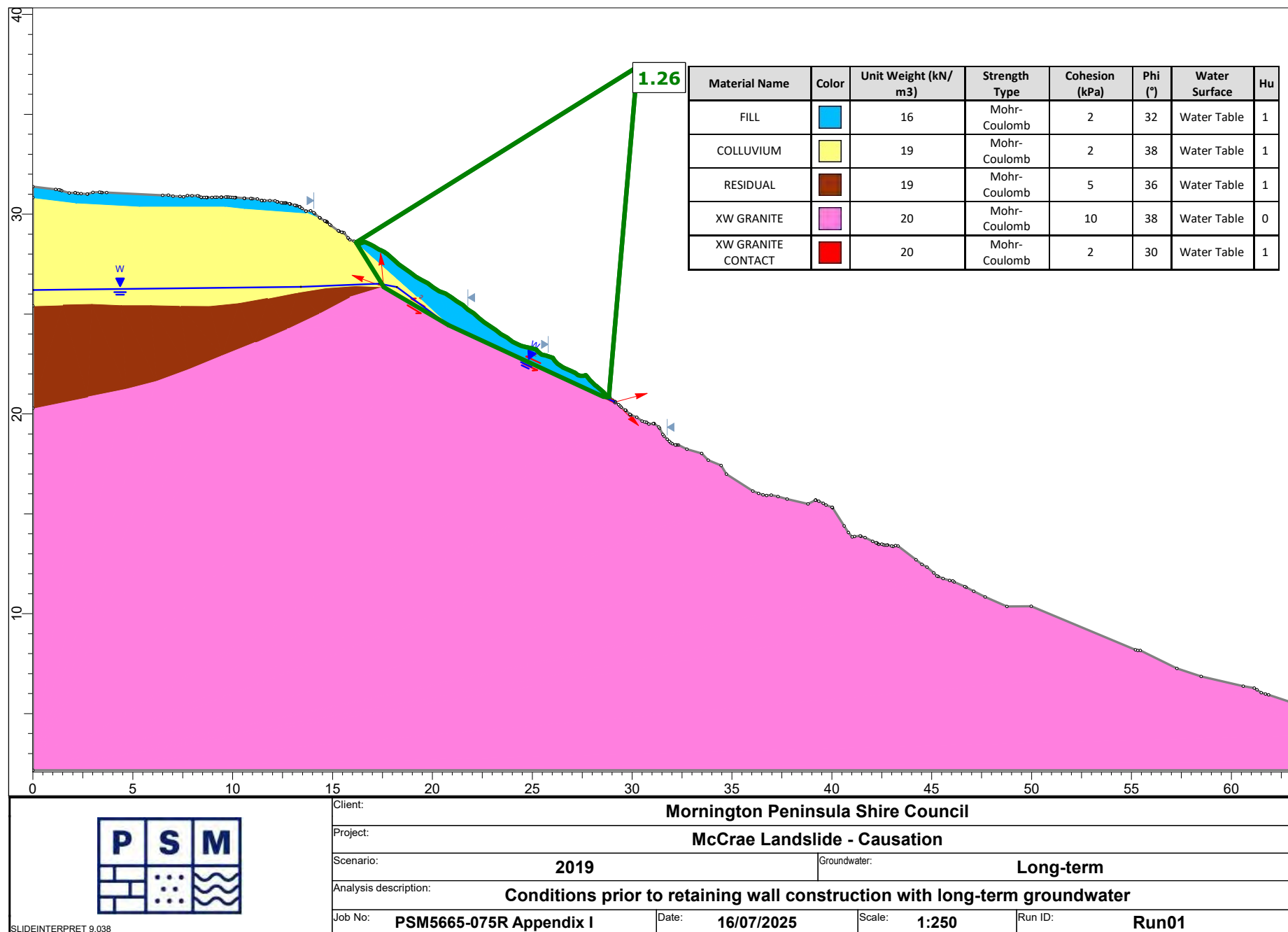
$$\therefore V_w = 0.6 \times 430 \times 2.8 \text{ kN/m}$$

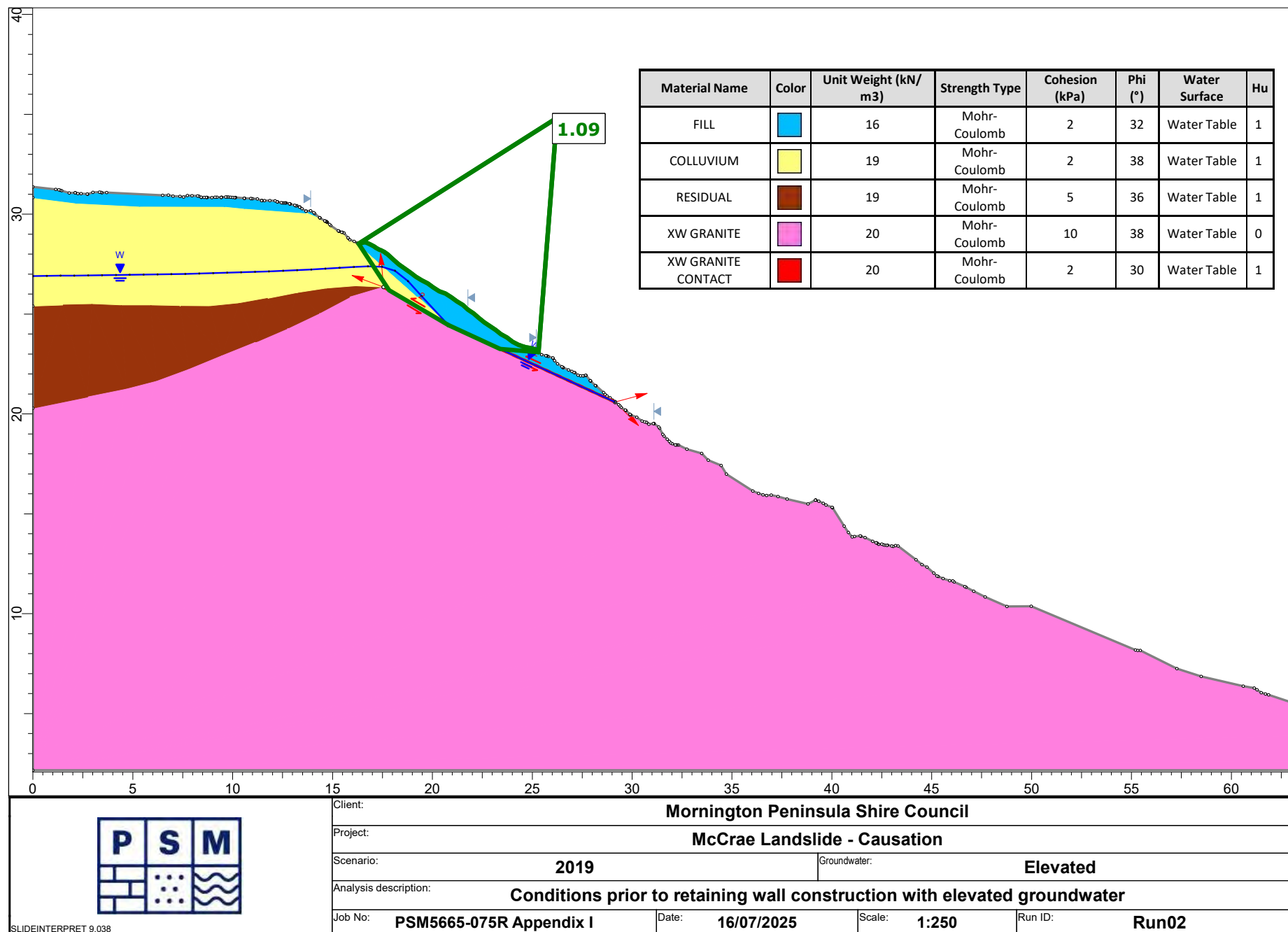
$$= 722.4 \text{ kN/m}$$

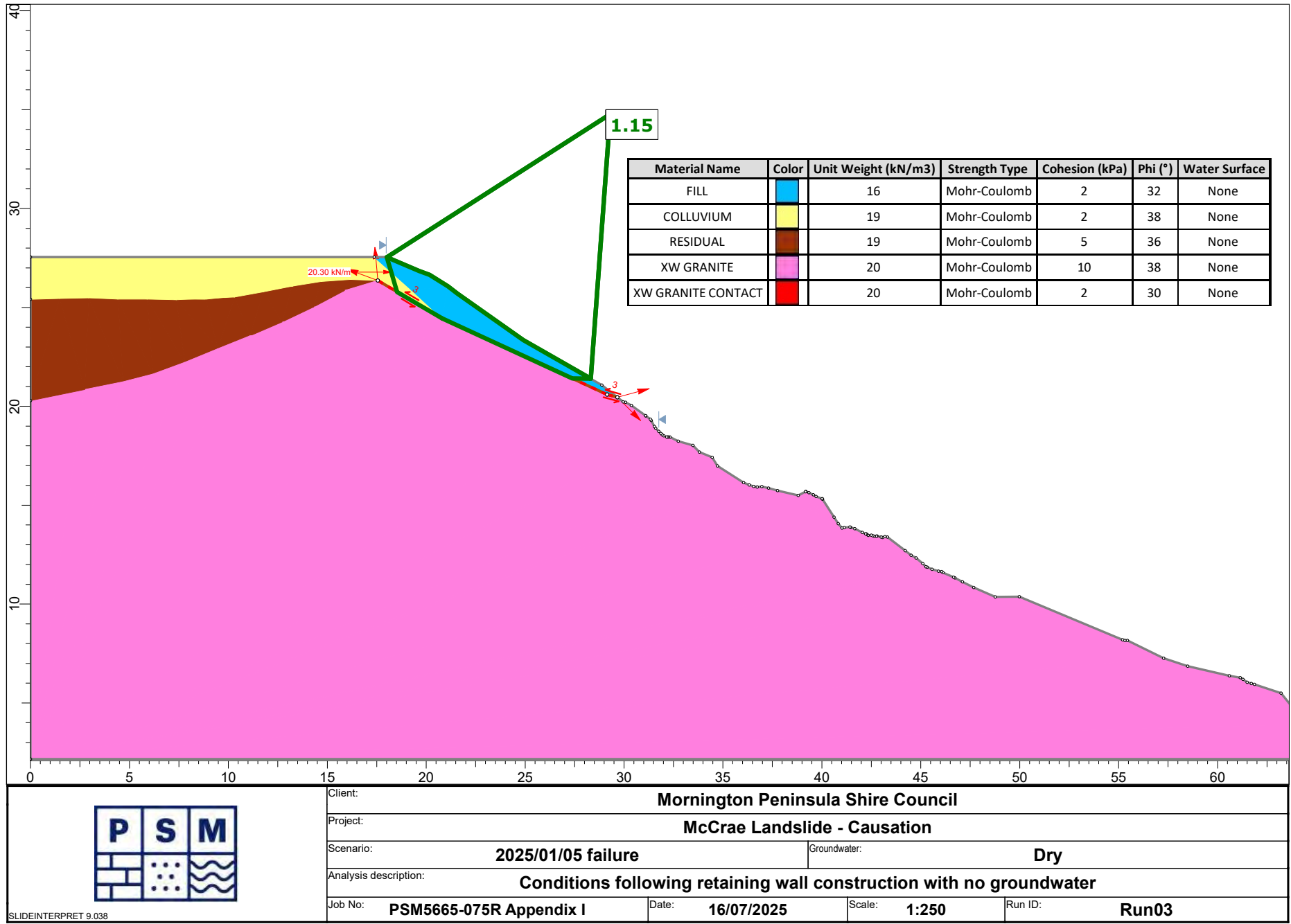
For a weld length of 200mm the nominal tensile capacity of the weld connection is estimated to be $0.2 \times 722.4 = 144.5 \approx 145 \text{ kN}$

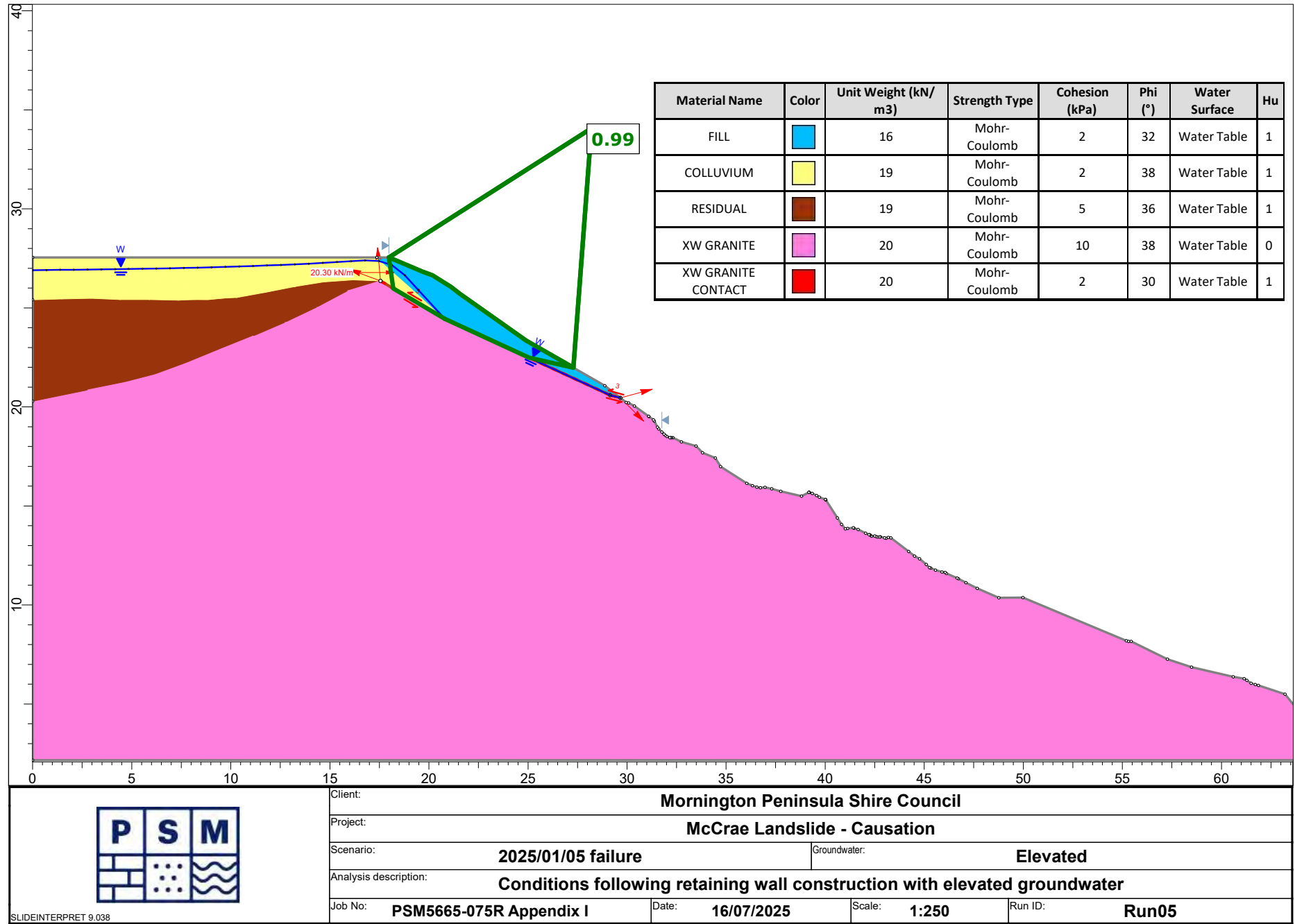
Appendix I

Stability Analysis Results

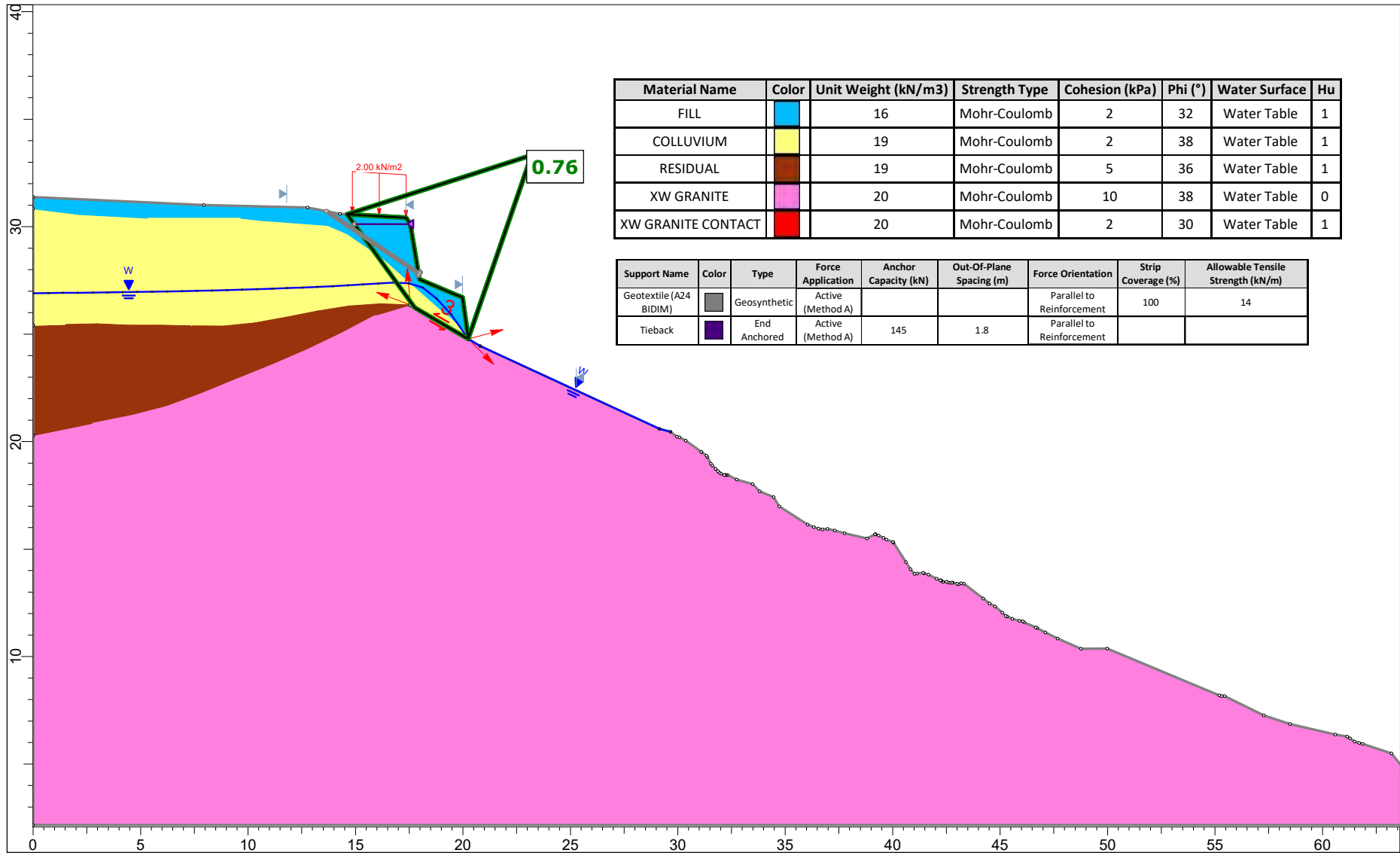








| | | | |
|-----------------------|--|--------------|------------|
| Client: | Mornington Peninsula Shire Council | | |
| Project: | McCrae Landslide - Causation | | |
| Scenario: | 2025/01/05 failure | Groundwater: | Elevated |
| Analysis description: | Conditions following retaining wall construction with elevated groundwater | | |
| Job No: | PSM5665-075R Appendix I | Date: | 16/07/2025 |
| | | Scale: | 1:250 |
| | | Run ID: | Run05 |



| Material Name | Color | Unit Weight (kN/m3) | Strength Type | Cohesion (kPa) | Phi (°) | Water Surface | Hu |
|--------------------|-------|---------------------|---------------|----------------|---------|---------------|----|
| FILL | | 16 | Mohr-Coulomb | 2 | 32 | Water Table | 1 |
| COLLUVIUM | | 19 | Mohr-Coulomb | 2 | 38 | Water Table | 1 |
| RESIDUAL | | 19 | Mohr-Coulomb | 5 | 36 | Water Table | 1 |
| XW GRANITE | | 20 | Mohr-Coulomb | 10 | 38 | Water Table | 0 |
| XW GRANITE CONTACT | | 20 | Mohr-Coulomb | 2 | 30 | Water Table | 1 |

| Support Name | Color | Type | Force Application | Anchor Capacity (kN) | Out-Of-Plane Spacing (m) | Force Orientation | Strip Coverage (%) | Allowable Tensile Strength (kN/m) |
|------------------------|-------|--------------|-------------------|----------------------|--------------------------|---------------------------|--------------------|-----------------------------------|
| Geotextile (A24 BIDIM) | | Geosynthetic | Active (Method A) | | | Parallel to Reinforcement | 100 | 14 |
| Tieback | | End Anchored | Active (Method A) | 145 | 1.8 | Parallel to Reinforcement | | |



SLIDEINTERPRET 9.038

| | | | |
|-----------------------|---|--------------|------------|
| Client: | Morningside Peninsula Shire Council | | |
| Project: | McCrae Landslide - Causation | | |
| Scenario: | 2025/01/14 failure | Groundwater: | Elevated |
| Analysis description: | Conditions of retaining wall following loss of passive wedge at the toe | | |
| Job No: | PSM5665-075R Appendix I | Date: | 17/07/2025 |
| Scale: | 1:250 | Run ID: | Run06 |