

ALFRED & BOUNDARY PTY LTD

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Dear Callum,

STATUS OF ENVIRONMENTAL ASSESSMENT & AUDIT: 59 – 101 ALFRED STREET AND 103 – 117 BOUNDARY ROAD, NORTH MELBOURNE VIC

The site located at 59 – 101 Alfred Street and 103 – 117 Boundary Road, North Melbourne VIC (“the site”), and is undergoing an Environmental Audit by EPA Auditor Mr Peter Mirkov from Peraco. The following provides a status on the progress of the Assessment Works and the Environmental Audit being completed at the site.

1 Completed Works

The site has been subject to detailed previous environmental investigations and remediation works, commencing in 2006. A Section 53X Environmental Audit was previously completed across most of the site (59 – 101 Alfred Street) by Lane Piper in 2011 (CARMS reference: 62988-1), which allowed for re-development of the site for commercial and industrial land uses. The current Environmental Audit is in support of a mixed-use including residential across the current full site extent.

Compass Environmental (Compass) have recently completed extensive soil, soil vapour and groundwater investigations across the site in support of the current Environmental Audit. Most recently, it was agreed that there were no significant material changes in groundwater conditions since the completion of the original Audit in 2011 and the previous Clean-up to the Extent Practicable determination remained valid. The possible exception was in the southeast corner of the site where higher NAPL impacts appeared to have been identified, and which possibly could be co-sourced from off-site (discussed further below).

2 Further Works Required

The following areas of work are required to support completion of the Environmental Audit:

- Review of available information on the historic use of the southeast corner of the site, to confirm potential sources of the identified NAPL, and possible sources both on and off-site.
 - Review of the practicability of clean-up will be required, with consideration of the possible presence of an off-site source.

- Further assessment of the groundwater conditions at the southern boundary, including re-survey of wells, and review of sewer and off-site infrastructure.
- Seeking access for the installation of delineation wells within the site to the south. This request has been made, and we are awaiting a response. If wells can be installed, they will be utilized to inform the extent of the Check Your Groundwater (CYG) extent. If not, the extent of the CYG will be made to Sutton Street.
- ☐ Re-sampling of selected wells, to confirm the western and eastern extent of the (CYG) area.
- ☐ Review of possible historical site features in the eastern end of the site, located below the existing commercial buildings, and where there is evidence of their presence, confirmation of their removal. If there is no evidence of their removal (if present), confirmation of their removal will be required. In this respect, there have been two options raised:
 - Excavation below the floor of the existing buildings, or as part of partial demolition of the commercial buildings. This would be adopted if it was envisaged as a timely exercise and would result in one Audit report for the entire site.
 - Excavation during full demolition of the commercial buildings. This result in two Audit reports for the entire site, with the far eastern area being issued an Audit report as a separate stage, following this exercise.
- ☐ Preparation of a submission to the Auditor in support of an updated Clean-up so Far as Reasonably Practicable (CUSFARP). Note, this is essentially the new CUTEP process, and requires a status letter to comprising a high-level summary of 2025 groundwater conditions, updated plume maps and confirmation of plume stability.

Anticipated timeframes are as follows:

- ☐ End of October 2025.
 - Installation of additional wells.
 - Completion of additional site history review.
 - Obtain access for the installation of new wells to south of site. Alternatively, if access is rejected, written correspondence will be provided to the Auditor that all reasonable attempts were made to get access.
 - Complete further on-site groundwater investigations and provide a detailed update to the Auditor.
- ☐ November 2025 to Q1 2026:
 - Based on the results of the above works, and subject to discussions with Peter to confirm their suitability, Compass would prepare the technical CUSFARP/CUTEP report. This would include:
 - Provide lines of evidence that the groundwater conditions are consistent with the 2011 CUTEP and Audit.
 - Complete updated feasibility assessment for cleanup to reflect new technologies since the original Audit.

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- The objective would be to issue this report to the Auditor, who will present this with this overarching report to EPA by end first quarter 2026

□ Q2 2026:

- Predicated on acceptance of the CUSFARP (CUTEP) submission by EPA, Compass would prepare the DSI report and the Auditor would complete the Audit report. As discussed above, there are two options in this respect:
 - If confirmation of removal of remnant structures was possible below the commercial buildings within the above program timeframe, a combined Audit would be prepared for the whole site.
 - If confirmation of removal of remnant structures was not possible below the commercial buildings within the above program timeframe, an Audit would be completed for the Stage 1 area, and a later Audit completed for the Stage 2 area (being the area of the commercial buildings).

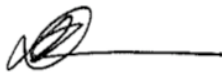
3 Limitations

The services performed by Compass Environmental have been conducted in a manner consistent with the level of quality and skill generally exercised by the consulting profession. Compass Environmental assumes no responsibility for any changes that may have occurred after this time. Compass Environmental has made no independent verification of this information and assumes no responsibility for any inaccuracies or omissions.

4 Closure

I trust this information assists. Please do not hesitate to call if you have any questions or require any further information or assistance.

For and on behalf of
COMPASS ENVIRONMENTAL PTY LTD



Damon Scoffern
Director
Principal Environmental Scientist

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