

14 March 2025

Wharf & Hughes Developments Pty Ltd
c/o Holdmark, 2/2-4 Giffnock Ave
Macquarie Park NSW 2113

Ref: E076

Attention: Fred Samaha

Sent via Email: fred@holdmark.com.au

Dear Fred,

Re: Interim Audit Advice Melrose Park South Development - West

Introduction

I have been engaged by Wharf & Hughes Developments Pty Ltd (the proponent) to conduct a non-statutory site audit of the Melrose Park South Development in accordance with the NSW Contaminated Land Management Act 1997.

Background

Melrose Park South – West is a mixed-use development located at 82 Hughes Avenue, Ermington NSW 2115, on land zoned as R4 high-density residential and RE1 Public Recreation under the Parramatta Local Environmental Plan 2023.

The site is located within the City of Parramatta LGA and is bounded by Atkins Road to the west, industrial properties to the north, Hughes Avenue to the east, and Ermington Bay to the south, and is approximately 5.2ha. The site is predominantly characterised by industrial development with warehouse like buildings proposed to be demolished under a separate development application (DA/75/2024).

The site has been identified for redevelopment as a part of the broader renewal planned for Melrose Park. This renewal will see the redevelopment of the precinct over time into a highly urban mixed-use precinct.

I have been advised that the State Significant Development Application seeks consent for:

- Construction of a mixed use development comprising approximately 123,197sqm of Gross Floor Area in Melrose Park South – West;
- Basement carparking and servicing; and
- Landscaping, and construction of one new waterfront park.

A separate Infrastructure DA (DA/75/2024) is under assessment by City of Parramatta Council which seeks consent for:

- Demolition of existing structures and tree removal on site;
- Earthworks to form design levels of the proposed roads and basins and future development lots;
- Infrastructure and servicing to enable the future development sites including trunk stormwater and utilities; and
- Construction of footpaths and roads.

I have also been advised that the infrastructure DA is an enabling DA which supports the SSDA. The matters considered under the SSDA works have been co-ordinated with the works under the Infrastructure DA.

Scope

I have previously reviewed a preliminary site investigation (PSI) and detailed site investigation (DSI) for the Melrose Park South (East & West) Development areas. I documented my review in an interim audit advice letter (IAA dated 22 July 2024).

The IAA was prepared in response to a request for information (RFI) from council during assessment of the Infrastructure DA (DA/75/2024), and provided my opinion on whether the recommendations provided in the DSI remain appropriate. I have attached a copy of the previous IAA, and there is no need to reproduce that information again here.

I have prepared this IAA, at the request of the proponent, to assess whether the conclusions of my previous IAA are still relevant and applicable to the SSDA.

Auditor Comments

The DSI concludes that the site can be made suitable for the proposed development subject to addressing recommendations listed in Section 11 of the DSI. The strategy recommended in the DSI is to prepare and implement a remediation action plan (RAP), asbestos management plan (AMP), waste management plan (WMP) and at completion of remediation, a validation report.

I agree that remediation will be required to render the site suitable for the proposed development and this will require preparation of a RAP. However, as stated in my previous IAA, in my opinion, more investigation is needed to characterise the site and support the remediation planning process. This is relevant to both the Infrastructure DA and the SSDA.

Given that there are still some activities operational on the site, it will be more appropriate and safer if the additional investigations (and remediation) are conducted following the site being vacated and infrastructure (including buildings) demolished.

I previously advised that I am satisfied that the recommendations documented in the DSI are appropriate subject to the following conditions:

- Preparation of a sampling, analysis and quality plan (SAQP) documenting an additional site investigation program (to be implemented post demolition). The SAQP must be reviewed and approved by a NSW EPA Accredited Site Auditor prior to implementation.
- The Remediation Action Plan (RAP) must be reviewed and approved by a NSW EPA Accredited Site Auditor prior to implementation.
- At the completion of remediation, the validation report must be reviewed and approved by a NSW EPA Accredited Site Auditor and a site audit statement issued certifying whether the site is suitable for the proposed development.

A SAQP is currently in preparation, and I have already reviewed a draft version and provided audit comments. I have been advised that the final SAQP will be issued in the next few weeks, at which stage I will undertake review and (if appropriate) approval of that document.

Conclusions

In conclusion, I am satisfied that the site investigation process is progressing in accordance with SEPP (Resilience & Hazards) 2021. Investigations completed to date have identified contamination at the site that requires remediation. Further investigation is required to inform the remediation process, although this is constrained by existing buildings. On completion of the investigations, a RAP will need to be prepared (and approved) prior to remediation works commencing.

It is recommended that conditions are incorporated into any approval, to ensure that the additional investigations are completed, and the RAP implemented prior to commencement of any construction work.

* * *

Consistent with the NSW EPA requirement for staged 'signoff' of sites that are the subject of progressive assessment, remediation and validation, I advise that:

- This advice letter does not constitute a Site Audit Report or Site Audit Statement.
- At the completion of the audit, I will provide a Site Audit Statement and supporting documentation.
- This interim audit advice will be documented in the Site Audit Report.

Yours faithfully,
Envirocene Pty Ltd



Julie Evans
NSW EPA Accredited Site Auditor 1003

Attached: Interim Audit Advice – Melrose Park South Development (Envirocene Pty Ltd, dated 22 July 2024)

22 July 2024

Wharf & Hughes Developments Pty Ltd
c/o Holdmark, 2/2-4 Giffnock Ave
Macquarie Park NSW 2113

Ref: E076

Attention: Fred Samaha

Sent via Email: fred@holdmark.com.au

Dear Fred,

Re: Interim Audit Advice – Melrose Park South Development

Introduction

I have been engaged by Wharf & Hughes Developments Pty Ltd (the proponent) to conduct a non-statutory site audit of the above sites in accordance with the NSW Contaminated Land Management Act 1997.

The Melrose Park South Development (the development) applies to two sites located within the southern portion of the Melrose Park South Precinct within the City of Parramatta local government area as follows:

- Melrose Park South - West (5.16Ha): 82 Hughes Avenue, Ermington (Lot 3 DP602080).
- Melrose Park South - East (4.27Ha): consisting of three properties located at 30 Waratah Street, 32 Waratah Street & 112 Wharf Road, Melrose Park (Lot 100 DP853170, Lot 1 DP519737, Lot 6 & 7 DP511531 & Lots 1, 2 & 3 DP127049).

A planning proposal (PP-2020-4038) for the development was approved in late 2022 and amended development standards to allow for a mix of high density residential and small-scale retail / commercial uses. The following contamination reports were submitted as part of the application:

- Senversa (April 2020) Preliminary Site Investigation, 2 Hughes Avenue, Ermington NSW. (*the PSI*)
- EIAustralia (May 2021) Detailed Site Investigation, 82 Hughes Avenue, 30 –32 Waratah Street and 112 Wharf Road, Melrose Park, NSW. (*the EIA DSI*).

The Development Application (DA) strategy for the site is intended to be separated into two phases:

- Infrastructure DA/75/2024– submitted to Parramatta Council on 21 December 2023 for street network (roads, footways, street trees, drainage, services, and associated infrastructure); including demolition, tree removal, remediation and bulk earthworks.
- Independent State Significant Development Applications (SSDA) for development for each site. It is understood that the outcomes of the infrastructure DA will inform the preparation of the two SSDAs for development.

In reviewing the Infrastructure DA, council have issued a request for information (RFI) dated 10 April 2024 of which the following relates to contamination:

Given the size of the development and that the submitted documentation is three years old, Council requests the proponent to engage an independent NSW EPA accredited site auditor to review the entire DSI and submit interim audit advice that the recommendations documented in the DSI remain appropriate. The auditor should also review the RAP, Waste Management Plan and Validation Report.

The purpose of this interim audit advice (IAA) is to provide my opinion on whether the recommendations provided in the [EIA] DSI remain appropriate.

At the request of the proponent, this IAA has been prepared to document my review of the investigations completed to date and to provide my opinion on whether the recommendations documented in the DSI remain appropriate.

Scope

To date I have completed a site inspection on 7 June 2024 and reviewed the Senversa PSI and EIA DSI. I note that the EIA DSI relies on investigation data from a previous investigation undertaken for the 82 Hughes Ave site by WSP (dated September 2018) and I have been provided with a draft version of the WSP DSI which I have also reviewed.

Summary of Investigations

Senversa PSI: The PSI (desktop assessment) was undertaken for the development sites to support the planning proposal submission for mixed-use medium-high density residential dwellings and green/open space. The PSI included review of information from NSW EPA registers, Safework NSW Dangerous Goods Records, historical aerial photographs, and historical business directory listings for the site and surrounding area. A summary of the site history is provided below

- The 80 Hughes Ave (GlaxoSmithKline) and 112 Waratah St (Eli Lilly) factories were constructed c1960's. Historical business directories indicate that the sites have been continuously used for chemical/pharmaceutical manufacture.
- The 32 Waratah Street site has historically been occupied by Austral Engineering (business directory listings between 1970-1991). Activities included steam valve manufacture, boiler compound manufacture, and industrial engineering supplies. The 30 Waratah Street site has been used by various industries, including demolition contractors (1961-1965), McNeal Plastic Engineering (plastic fabricators & or vacuum forming), McNeal Air Conditioning, Dronaco (swimming pool equipment, plumbing supplies) and ACP (cabinet makers/furniture manufacture).
- Various commercial and industrial sites were identified in the surround area including the former Reckitt Benckiser, Pfizer and Big Sister sites, radiator workshop, plastic piping fabrication, mechanics, carpet supplier, rubbish collection depot and gaming machine servicing. Senversa noted that the former Reckitt Benckiser site is known to have undergone remediation for chlorinated solvent impacts with trichloroethane and 1,4-dioxane. The Pfizer site is known to have had a number of spillages and releases of veterinary related compounds to the ground.

Based on the desktop review, Senversa identified potential sources of contamination and contaminants of potential concern associated with:

- leaks and spills associated with current and historical storage and handling of chemicals, hazardous goods and fuels; leaks from
- Leaks from trade waste lines and underground drainage services
- Fill material of unknown origin
- Hazardous materials within on-site building structures.
- Neighboring industrial/commercial facilities and
- Viva fuel pipeline

Senversa recommended that at development application stage or prior to development, further assessment of the proponent owned properties is carried out and should include:

- A more extensive groundwater assessment at Melrose Park South - West (GSK).
- A DSI at properties within Melrose Park South - East (all three properties).
- If required a remedial action plan (RAP) should be produced that determines how the site should be remediated to make it suitable for the proposed land uses.

EIA DSI: The investigation was undertaken to evaluate the potential for contamination, investigate the degree of any potential contamination by intrusive sampling and to make recommendations for appropriate management of any contamination in soil and/or groundwater. A total of 57 boreholes (primarily judgmental sampling locations) were drilled across the Melrose Park South - East site. Two groundwater wells were installed on the Melrose Park South - West site to supplement the previous WSP investigations.

Based on the results of the DSI, EIA reported the following contamination issues:

- Elevated metals in fill on the 30-32 Waratah sites.
- Localised asbestos in fill on the 82 Hughes Ave (GSK) site.
- Elevated dissolved metals in groundwater. The highest concentrations were noted on the 82 Hughes site and were attributed to background conditions.
- Elevated PFAS compounds identified in groundwater on the 30 Waratah St site.

EIA identified the following data gaps:

- Investigations have not extended underneath existing buildings across the Melrose Park South - East site.
- Monitoring wells installed across 32 Waratah were dry and groundwater across the site has not been characterised.

Nevertheless, EIA concluded that based on the findings of the DSI, widespread contamination was not present at the site and the site can be made suitable for the proposed development, subject to:

- Preparation and implementation of a Remediation Action Plan (RAP). EIA noted this should include, but not be limited to remediation of contamination in fill, confirmation of groundwater quality, and a plan for validation to confirm site suitability following remedial works.
- Preparation of an Asbestos Management Plan (AMP) in order to outline control measures required to prevent exposure of site personnel.
- A waste management plan (WMP) to include classification of waste and assessment of imported material.
- Preparation of a final site validation report by a qualified environmental consultant, certifying site suitability for the proposed development.

Auditor Comments

The strategy recommended by EIA is to prepare and implement a remediation action plan (RAP). I agree that remediation will be required to render the site suitable for the proposed development and this will require preparation of a RAP. However, in my opinion, more investigation is needed to characterise the site and support the remediation planning process.

Given that there are still some activities operational on the site, it will be more appropriate and safer if the additional investigations (and remediation) are conducted following the site being vacated and infrastructure (including buildings) demolished.

Conclusions

In conclusion, I am satisfied that the recommendations documented in the [EIA] DSI are appropriate subject to the following conditions:

- Preparation of a sampling, analysis and quality plan (SAQP) documenting an additional site investigation program (to be implemented post demolition). The SAQP must be reviewed and approved by a NSW EPA Accredited Site Auditor prior to implementation.
- The Remediation Action Plan (RAP) must be reviewed and approved by a NSW EPA Accredited Site Auditor prior to implementation.

- At the completion of remediation, the validation report must be reviewed and approved by a NSW EPA Accredited Site Auditor and a site audit statement issued certifying whether the site is suitable for the proposed development.

* * *

Consistent with the NSW EPA requirement for staged 'signoff' of sites that are the subject of progressive assessment, remediation and validation, I advise that:

- This advice letter does not constitute a Site Audit Report or Site Audit Statement.
- At the completion of the audit, I will provide a Site Audit Statement and supporting documentation.
- This interim audit advice will be documented in the Site Audit Report.

Yours faithfully,
Envirocene Pty Ltd



Julie Evans
NSW EPA Accredited Site Auditor 1003