

21 November 2024

Bulent Seri  
Horoz Pty Ltd  
PO Box 655  
Port Melbourne 3207

**CITY OF MARIBYRNONG  
ADVERTISED PLAN**

Dear Bulent,

**38-40 Moreland Street, Footscray**

A multi-storey mixed-use building is proposed for construction at the above address. Ground floor use would be commercial, with seven stories of residential apartments above.

Condition 14 of Maribyrnong City Council Planning Permit Application No. TP262/2024(1) requires "*An Environmental Site Assessment detailing the likelihood of contamination in accordance with point 6 (Application Requirements) of Schedule 1 to clause 37.08*".

As an interim measure, to provide insight into the potential for site contamination, a detailed review of relevant site information was undertaken by Lotsearch. A copy of the report titled "Lotsearch Enviro Professional – 38-40 Moreland Street, Footscray VIC 3011" (LS066302 EP), dated 13 November 2024, can be opened [here](#).

A summary of potential key contaminant identifiers is presented in the following sections.

**1 Review of Historical Business Directory Records**

Subject Site:

There are no business listing for the subject site. This may be due to the site formerly being part of a larger site.

Relevant Nearby sites in this Setting:

- To the west at No.'s 1 & 3 Whitehall Street, Footscray, several businesses are listed including:
  - Jabber, F., - carpenters listed in 1945
  - Speer Brother – bag and/or sack manufacturers listed at No. 1 between 1960 – 1984,
  - Wright R J – roofing contractors and/or repairers – listed at No. 3a in 1984
  - Westtransit Bus Lines Pty Ltd listed at No. 3 in 1991
  - Budget Rent A Car – motor car hire services listed at No. 1 in 1991.
- To the north east at No 36 Moreland Street, Footscray several businesses are listed including:
  - Nutland, - nut products listed in 1965
  - Ensign Press – printers listed from 1980 – 1984
  - Custom Sales Pty Ltd Crazy Shirts – Printers listed in 1991,
  - Crazy Shirts Pty Ltd – screen printers listed in 1991.
- To the south west at 11 Whitehall Street, Footscray David Brown Gear Industries Pty Ltd - Transmission Equipment Manufacturers &/or Distributors is listed in 1991.

- 8 metres to the north west at 11 Wingfield Street, Footscray Conway Fish Trading - Food Products - Frozen Manufacturers &/or Processors are listed in 1991.
- 8 metres to the north west at 13 Wingfield Street, Footscray Sayers, Mrs C. A.,- pastrycooks – retail are listed in 1945.
- 19 metres to the north east at 34 Moreland Street, Footscray Krystyna Gendala Gowns – clothing manufacturers are listed in 1980.
- 30 metres to the east at 37 Moreland Street, Footscray Port Philip Mills Pty. Ltd – wool top manufacturers are listed in 1977, then Moreland Furniture Co – furniture manufacturers in 1980, along with Camabt Office Contracts Pty Ltd – office equipment manufacturers.
- 31 metres to the south east at 41-49 Moreland Street, Footscray Purvis-Glover Engineering Pty. Ltd – engineers, founders, motor accessory manufacturers, bearing manufacturer, bushing manufacturers are listed between 1945 – 1974. The site is then occupied by Robinvale Citrus Groves – seedsmen & nurserymen between 1977 – 1991.
- 45 metres to the south east at 45 Moreland Street, Footscray Lempriere, O. T., & Co. Ltd.,– diamond tools and/or industrial diamonds manufacturer, metal merchants, solder manufacturers are listed in between 1965 - 1974.
- 58 metres to the south west at 17 - 21 Whitehall Street, Footscray, the two businesses listings were:
  - Richardson, D., & Sons Pty. Ltd – engineers, metal merchants, gear cutters, founders, sheet metal workers, are listed at No 17 & 21 between 1905 – 1974
  - David Brown, Gear Industries Limited – power transmission equipment, gear boxes, flexible coupling and bearing manufacturers are listed between 1974 – 1980.
- 77 metres to the north west at the intersection of Whitehall & Wingfield Streets, Footscray Whitehall Body Works Pty Ltd - Motor Panel Beaters &/or Spray Painters are listed in 1991.

## 2 Review of Nearby Historical Dry Cleaners, Motor Garages & Service Stations

The closest former motor garage / service station is located at 45 Hopkins Street, Footscray, 105 metres to the north west. The business is listed as operating between 1945 – 1978 (BP Footscray). The site is currently a Budget Car Hire business

Two other service stations were situated adjacent to the above site (Shell Footscray & Solo Service Station), approximately 140 – 150 metres to the north / north west of the subject site. The sites were listed as being operational between 1965 – 1992 and 1966 – 1988 respectively.

No dry-cleaning businesses were listed in the one-kilometre buffer zone of the subject site.

## 3 Review of Historical Aerial Photographs

A review of available historical aerial photographs presented in the Lotsearch report taken between the period 1931 - 2024 identified the following information:

- 1931: some buildings and structures are present, which appear to be commercial/industrial in nature. The rear portion of the land appears open with some vegetation. The surrounding area is built up with a mixture of residential and commercial/industrial premises.
- 1945: Two buildings front Moreland Street. The rear yard is open with some vegetation and smaller buildings and structures. Surrounding land use appears to be predominantly commercial/industrial in nature.
- 1951: similar conditions to 1945.
- 1960: similar conditions to the above. A building has been constructed in the north western section of the site and to the immediate north east (along Little John Street).

- 1968: Similar to 1960, although a large commercial/industrial building has been constructed over the western section of the site.
- 1975-1989: similar to 1968 conditions.
- 2000: The two smaller Moreland Street fronted buildings have been removed and the site paved. An addition had been constructed to the south east of the large rear commercial/industrial building.
- 2012-2018: similar conditions to 2000.
- 2019: a commercial/industrial type building has been constructed along the south eastern boundary.

More recent activity at the site has included light commercial uses including a milk bar and a community bike hub.

#### 4 Review of Historical Maps

The historical and Melways maps reviewed during the period 1933 – 2009 did not identify any distinguishing features or observations associated with past land use at the subject site.

The 2009 Melways Directory identifies Ryco as the large commercial/industrial operation to the south of the site, along with Conway Fish Trading to the north west.

The 1895 MMBW plan identifies the site as being devoid of buildings, structures and site drainage features.

#### 5 Review of EPA Priority Sites Pollution Notices & EPA Licenced Activities

The site, nor adjacent sites are listed on the Priority Sites Register.

One site is currently listed within the one-kilometer buffer zone, located at 200 Whitehall Street, Footscray (950 metres to the south west). The site is a current industrial site requiring assessment and/or clean up.

The closest site previously listed on the register is Footscray BP located at 32-50 Napier Street, Footscray (350 metres to the south west). The site was issued with a Pollution Abatement Notice during 2017.

#### 6 Review of PFAS Investigation & Management Programs

The Lotsearch review included a review of PFAS investigations and management programs in the area, which did not identify any records in the buffer zone.

#### 7 Defence Sites and Unexploded Ordnance

The site, nor adjacent sites are listed on the database.

One site has been assessed for unexploded ordnance; Footscray Ammunition Factory, located 1,462 metres to the north. This was the site of an Explosives Factory.

#### 8 Review of Preliminary Risk Screening Assessments & EPA Environmental Audits.

Numerous EPA Environmental Audits have been completed in a one kilometre radius of the subject site. The closest site is located at 37-39 Moreland Street, Footscray (30 metres to the east). A Statement of Environmental Audit was issued 28/10/2008. Historical land use included a wool mill, air raid shelter during the war and storage. Groundwater intersected in Newer Volcanics basalt at approximately 17.5 metres with a standing water level of 12.9 metres. Groundwater was calculated to flow in a westerly direction and was expected to discharge to the local sewer system rather than Maribyrnong River.

The next closest EPA Environmental Audit site was 41-43 Moreland Street, Footscray (31 metres to the east). A Statement of Environmental Audit was issued 28/05/2010. Historical land use included non-ferrous metal foundry

and then engineering/warehousing. Groundwater resided between 10-19 metres below ground level in basalt, flowing to the south west.

No Preliminary Risk Screening Assessments have been completed in the one kilometre search zone.

### 9 Review of EPA Groundwater Quality Restricted Use Zones (GQRUZs)

Several GQRUZ's have been designated within the one-kilometre buffer zone. The closest GQRUZ is located at 22-24 Hopkins Street, Footscray (60 metres to the north). The site was a former service station. Groundwater resides at 13-15 metres in Newer Volcanic Basalt, flowing to the south east, towards a deep sewer located approximately 100 metres to the south.

### 10 Review of EPA Licenced Activities

Several sites were listed as Registered for EPA Activities. The closest site is located directly to the south at 11-13 Whitehall Road, Footscray for a non-scheduled activity with waste designation permission. The next closest site is 4 Tannery Walk, Footscray, (191 metres to the north), which is also a non-scheduled activity with waste designation permission.

A legacy licenced activity for DP Works Australia Limited, located at 29-79 Mackenzie Road, West Melbourne (774 metres to the south) was licenced for sewage treatment.

### 11 Review of Waste Management Facilities & Landfills

The site, nor adjacent sites are listed as waste management facilities or landfills. Several operational waste transfer stations are situated between 489 – 898 metres from the subject site. Materials managed at the sites include recycled materials, construction and demolition waste and municipal waste.

A former landfill was situated alongside Maribyrnong River, 457 metres to the north of the site. The landfill was licenced to receive municipal and solid waste commencing in 1944 and ceasing in 1949.

### 12 Review of Historical Mining Activity

No records of mining shafts are listed in the buffer area.

### 13 Acid Sulphate Soil

Extremely low probability of acid sulphate soil occurrence (1-5% chance). 66 metres to the east have a high probability (>70%) of occurrence of acid sulphate soils. Coastal acid sulphate soils are considered to have made land 80 metres to the south east.

### 14 Site Inspection

On 20<sup>th</sup> November 2024, Environmental Assessment Services Pty Ltd conducted a site inspection. During the inspection the following observations were made:

- A factory / warehouse building occupies the western portion of the site. The raised floor was paved in concrete. The concrete was found to be in reasonable condition. Footprints of former machinery were observed in some areas of the warehouse. Anecdotal information indicates that the site has been used for the manufacture of metal products and an auto electrician.
- The front forecourt area (eastern portion of the site, fronting Moreland Road) has both paved and unpaved sections.



- There was no evidence identified relating to the presence of below ground infrastructure such fuel storage tanks or waste pits. No fill points, dip points, vent lines or bowser footprints were identified internally or external to the existing buildings and infrastructure.
- It is noted that previous site activities has included the storage and use of flammable gas and corrosive materials liquids as evidenced by the signage in the photos below:



*Photo 1 Central roller door entrance to warehouse.*



*Photo 2 – Western wall of south eastern extension*

- It is also noted that the adjacent site to the south is being prepared for a proposed medium-high density residential development. Numerous groundwater monitoring wells and soil vapour bores have been installed at the site, as depicted in the photos below (indicating the presence of site contamination).



*Photo 3 Eastern portion of development site*



*Photo 4 – Western portion of development site*

As would have been the case for the former Ryco site to the south, more detailed site assessment works at the subject could be undertaken as part of future planning permit condition requirements.

## 15 Potential Contamination Issues

Based on the background information compiled, a summary of potential site contamination is provided below:

Table 1 – Potential Site Contamination Review

Potential Source	Potential Contaminants
<i>On-Site:</i>	
Corrosive chemical storage:	Acids and bases (i.e. hydrochloric acid, sulfuric acid, sodium hydroxide, potassium hydroxide)
Imported fill:	Metals, petroleum hydrocarbons, chlorinated solvents, polycyclic aromatic hydrocarbons, pH, asbestos.
Building materials:	Former asbestos containing materials (i.e. cement sheet, electrical switchboards / lining).
<i>Off-Site:</i>	
Iron and steel works:	BTEX, phenolics, PAH, Metals and oxides of iron, nickel, copper, chromium, magnesium, manganese and graphite
Metal treatment:	Nickel, chromium, zinc, aluminium, copper, lead, cadmium, tin, sulfuric, hydrochloric, nitric, phosphoric acids.  Sodium hydroxide, 1,1,1-trichloroethane, tetrachloroethylene, toluene, ethylene glycol, cyanide compounds. Sodium, cyanide, barium, chloride, potassium chloride, sodium chloride, sodium carbonate, sodium cyanate
Printers:	Hydroquinone, sodium carbonate, sodium sulfite, potassium bromide, monomethyl para aminophenol sulfate, ferricyanide, chromium, silver, thiocyanate, ammonium compounds, sulfur compounds, phosphate, phenylene diamine, ethyl alcohol, thiosulfates, formaldehyde Acids, alkalis, solvents, chromium
Motor garages / service station sites (former & current):	Aliphatic hydrocarbons, BTEX (i.e., benzene, toluene, ethylbenzene, xylene) PAH, Phenols, Lead, MTBE, chlorinated hydrocarbons.

Based on a review of information collated, the following preliminary conceptual model has been devised.

Table 2 – Preliminary Conceptual Site Model

Primary & Secondary Sources	Transport Mechanism	Exposure Pathways	Potential Ecological & Human Receptors
<i>On-site</i>	<ul style="list-style-type: none"> <li>Direct contact</li> <li>Wind</li> <li>Atmospheric dispersion</li> <li>Vertical migration through sub-surface</li> </ul>	<ul style="list-style-type: none"> <li>Dermal contact / absorption</li> <li>Oral / ingestion</li> <li>Inhalation of vapour</li> </ul>	<ul style="list-style-type: none"> <li>Proposed high-density residential use</li> <li>Maintenance personnel</li> <li>Abstraction of groundwater</li> <li>Moonee Ponds Creek, approximately 450 metres to the east. Maribyrnong River approximately 1.5 kilometres to the south west.</li> </ul>
<i>Off-site</i>	<ul style="list-style-type: none"> <li>Migration of soil vapour</li> <li>Surface flow / drainage</li> <li>Migration of dissolved phase contaminated groundwater</li> </ul>		
<ul style="list-style-type: none"> <li>Storage &amp; use of corrosive materials</li> <li>Importation of soil</li> <li>Building materials</li> <li>Iron and steel works</li> <li>Metal treatment</li> <li>Printers</li> <li>Service station sites</li> </ul>			

## 16 Findings

Based on the completed desktop review, other than importation of fill, former building materials and storage of corrosive materials, the identified site activities have had limited capacity to have contaminated the land.

Based on the history of commercial / industrial land use in the area (particularly the large industrial premises to the south), potential off-site contamination sources have included activities which may have contaminated the land, groundwater and air segments of the environment.

The proposed high-density residential landuse would typically limit access to the sub-surface (i.e. construction of the apartment building and the application of paved surfaces across all or the majority of the site).

Based on the site inspection and desktop study, the proposed high-density development is unlikely to be precluded, once the site is assessed to an acceptable standard and appropriate site management procedures are fulfilled.

Please do not hesitate to contact me should you have any queries regarding the information presented in this correspondence.

Yours faithfully,



Tony Connolly  
Environmental Consultant

**LIMITATIONS:**

Works conducted for the assessment were done in accordance with the agreed scope of works between Environmental Assessment Services Pty Ltd and Horoz Pty Ltd.

The scope of works did not incorporate a detailed site assessment [i.e. intrusive soil investigations, groundwater investigations, vapour investigations or sufficient works to allow for a Certificate/Statement of Environmental Audit].

This report shall not be used for purposes other than those agreed in the scope of works and distribution of the report shall be presented in full with permission.