

2 June 2020

Reference: 2018101

Geraldine Pham
Fairfield City Council
86 Avoca Road
Wakeley 2176

Dear Geraldine,

Development Application No. DA 300.1/2019

Site Address - 74 – 76 Seville Street, Fairfield East 2165

We refer to the aforementioned development application and your emails dated 19 December 2019 and 27 February 2020. The correspondence raised the following concerns in relation to the proposed development for which consent is sought. These matters are addressed below.

1. Planning Matters

External works and storage

All business activities associated with the proposed use as well as storage of cars, recovered gear boxes and engines will be undertaken internally to the premises, to minimise any potential noise impacts. Prior to off-site transfers, the recovered goods will be transported through forklift operators who are appropriately licensed and supervised and will be stacked adjacent to the loading area temporarily. This is to ensure that the goods are loaded into the trucks in a timely manner. Apart from this, the external areas of the premise will be kept free of clutter at all times. Further, the signage has been amended to ensure it is located wholly within the premises. Amended drawings, prepared by Wayne Wilson, accompanies this information.

Site Operations

The Proponent acknowledges Council's concerns that the site has a potential for larger handling capacity, given its size. Therefore, whilst the Proponent does not intend to increase the handling capacity in the foreseeable future, consent is sought to store a maximum of 100 cars at any one time.

In terms of access to the general public, the site is proposed to be operated in a controlled arrangement for occupational health and safety reasons, with public access to the site restricted only to the administration building located at the front. Further, this will be undertaken on an appointment basis only. No access will be provided to the working areas of the premises.

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Acoustic Amenity Impacts

The operational hours will be 7:00am to 5:00pm, Monday to Friday and 7:00am to 12:00pm on Saturdays.

The premises will not operate on Sundays or public holidays.

The Noise and Vibration assessment has been updated to address the matters raised by Council and accompanies this letter.

2. Environmental Matters

The table below provides a response to matters raised by Council's Environmental Management Section:

Council's Concerns	Proponents Response
<p>1. Plans indicating:</p> <ul style="list-style-type: none">• Position of all the bundings within the premises• Bunding for liquid container• Position of spill kits• Wash bay• Bin storage area• Position of EnviroPod with hydrocarbon absorbing membranes to mitigate hydrocarbons runoff from hardstand area during rainfall.• Position of oil/water separator• The floor of waste storage area to be graded and the water to be directed to a sewer authority approved drainage connection• Location of the oil/water separator as per submitted Water Management Plan	<p>Amended drawings, prepared by Wayne Wilson, Drawing No. 18-127-07, Revision 1DA, accompanies this information.</p>
<p>2. A Plan of Management detailing how the operator will maintain and monitor the development with respect to waste management and water management.</p>	<p>These aspects are addressed in the updated waste management and water management plans.</p>
<p>3. The acoustic assessment and report must adequately stipulate that the proposed development will be compliant with the NSW Environmental Protection Guidelines including the Industrial Noise Policy</p>	<p>As discussed previously, an updated Noise and Vibration assessment accompanies this letter.</p>



Council's Concerns	Proponents Response
and Environmental Noise Control Manual, and relevant Australian Standards.	
4. A Maintenance report for existing oil /grease trap	As recommended in the waste management report, the Proponent has engaged Cleanway Liquids NSW, a suitably qualified company for maintenance of the existing oil/grease trap. Prior to the commencement of operations on site, Cleanway will clean the existing oil/grease trap and the Proponent will subsequently submit a certificate to Council that confirms that the oil/grease trap is suitable for purpose, complies with relevant standards, and is in good working order. We seek that the Consent Authority includes a condition requiring compliance with the waste management report.
5. A valid waste and recycling collection contract from the private waste contractor	A copy of the contract accompanies this letter.
6. An Environmental Protection Plan for the UPSS in accordance with the Guidelines for Implementing the POEO (UPSS) Regulation 2019.	A Fuel System Operation Plan (FSOP) ¹ along with an incident management procedure for the UPSS accompanies this application.

3. Traffic Matters

Matters relating to traffic and parking are addressed in the letter prepared by Varga Traffic Planning and accompanies this letter.

4. Fire & Rescue NSW

A letter prepared by Lote Consulting addressing the matters raised by FRNSW.

5. EPA Assessment

The EPA has advised that an Environment Protection Licence would not be required once the proposed facility commences operation. A copy of the correspondence received from EPA accompanies this letter.

6. Public Notification

The application received three submissions during the public notification. The table below provides responses to the neighbours' concerns.

¹ A Environmental Protection Plan (EPP) is now addressed as a Fuel System Operation Plan (FSOP).



Neighbors' Concerns	Proponents Response
Acoustic amenity impacts from the operation of the site	The noise survey and modelling takes into consideration the proposed activities and equipment based on a worst-case scenario. The Noise and Vibration assessment concludes that the facility operations would only be faintly audible at the nearest sensitive receiver when measured during the daytime; thus, the development is feasible on the basis of a lack of noise emissions.
Air quality impacts and odour amenity impacts from the operation of the site.	<p>The air quality assessment identified that odour emissions may occur from the storage of volatile chemicals, as well as spillage of such chemicals. Considering only small quantities of volatile liquids are expected to be used on site, the released VOC concentrations are expected to be very low and effectively manageable through the implementation of management measures.</p> <p>Despite these findings, mitigation measures are proposed for both odour and dust to further ameliorate potential air quality impacts as a result of the proposed activity at the site.</p> <p>The proposed physical and operational mitigation measures for proposed facility to control air emissions include:</p> <ul style="list-style-type: none"> ○ All vehicles will be inspected on arrival for signs of oil leaks. Where there is a risk of an oil leak, the leak will be sealed, or part drained, in order to stop further leaking. ○ Dismantling of vehicles will only take place in designated areas inside site building and in the area so designated for that purpose. ○ All waste oils, coolant fluid and fuel will be stored in containers with their lids closed to avoid evaporation and loss of materials. ○ Taps or pumps will be installed on containers of volatile liquids to minimise losses to the atmosphere.
Environmental impacts to the nearby residential properties;	<p>The site maintains a good separation distance from residential receptors. The site has existing utilities and buildings, an administrative building and a sealed surface and therefore has minimal environmental impacts as the proposal involves use of the existing buildings and facilities on site.</p> <p>The proposal only has minor or negligible environmental and social amenity impacts with the implementation of the recommended mitigation and management measures as nominated by the relevant consultant disciplines, accompanying this application. The proposed mitigation measures will assist the consent authority in formulating conditions to be imposed on any future development consent to ensure that the environmental impacts of the proposed development are suitably managed during operation of the facility.</p>
Potential for the discharge of pollutants into the creek adjoining the	Given the nature of proposed use, only limited amount of liquids will be handled on site. These predominantly relate to the liquids or oils obtained during the dismantling process and will be stored



Neighbors' Concerns	Proponents Response
site to the rear (Burns Creek), causing impacts to the ecosystems	<p>in a container provided by the waste management company to ensure that the operation of the site has no adverse environmental impacts, nor risk of spill. The liquid containers (recovered hydrocarbons) are self-bunding.</p> <p>The carpark areas shall be installed with Enviropod filters at the stormwater inlets, and will discharge from site <i>via</i> the oil-water separator/GPT.</p> <p>A part of the roof will discharge directly from site to Burns Creek. The remainder of the roof water will be captured in the existing pit and pipe stormwater system, and mixed with runoff from the hardstand, then discharge from site <i>via</i> the proposed oil-water separator/GPT.</p> <p>An updated Water Management Plan accompanies this letter.</p>
Car debris being stored on the street	As discussed previously, all business-related activities including storage, handling and transport of materials will be undertaken within the premises. The Plan of Management accompanying this letter outlines the proposed management measures to appropriately address these.

7. Record of Briefing

Council briefed the Sydney Western City Planning Panel (the Panel) on 24 February 2020. The table below provides a response to additional information/clarification sought by the Panel.

Key Issues	Proponent's Response
Clarification was sought as to whether the public will access the site noting the proposed signage.	Refer previous discussions.
Council's traffic engineer should consider whether there are issues of pedestrian safety on site for workers or visitors	Noted.
The possibility of moving some of the planned activities inside the available warehouse space might be considered with potential acoustic and environmental benefits, and in any event the use of warehouse 1 should be clarified.	Matters in relation to this has been addressed previously.
The processes permitted on site and the use of the premises will need to be carefully identified to ensure that all amenity, safety and environmental issues are considered. Safety issues in relation to drained fuel tanks and other noxious liquids, flammable materials,	The proposal involves installation of EnviroPod filters with oil-adsorbent media, to be retrofitted to existing stormwater surface inlets to capture the grease and oil from the hardstand catchment. In addition to this, a Class 1 dual chamber oil water separator is proposed to be installed to treat stormwater runoff prior to discharge from site. This is done so primarily to capture



Key Issues	Proponent's Response
and the risk of spills entering the stormwater system, were raised.	hydrocarbons, but also sediment loads, and, to a lesser extent, nutrients from car parking and hardstand areas
Assessment of compliance with applicable guidelines in relation to the USD(s) and oil/grease trap on site is needed.	A Fuel System Operation Plan accompanies this application.
Acoustic impacts were considered. Demonstration of compliance with the Industrial Noise Policy and applicable guidelines will assist, noting the reservations in the present acoustic report. Management of acoustic impacts will be crucial to any application to vary the standard DCP operating hours.	Noted, an updated acoustic and vibration report accompanies this letter.

We trust that the enclosed information will now enable the consent authority to continue with their assessment of this application. Should you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,



Vidhya Ramesh
Project Manager



19 August 2020

Reference: 2018101

Geraldine Pham
Fairfield City Council
86 Avoca Road
Wakeley NSW 2176

Dear Geraldine,

Development Application No. DA 300.1/2019

Site Address: 74 – 76 Seville Street, Fairfield East 2165

We refer to the aforementioned development application and your correspondence dated 07 July 2020. The correspondence raised the following concerns in relation to the proposed development for which consent is sought. These matters are addressed below.

1. Planning Matters

External works and storage

We understand Council's concern predominantly relates to temporary storage of recovered goods externally, and adjacent to, the loading area. Further, Council requested several additional documents/further information to enable further assessment in relation to this aspect.

To address this concern, the engines and gearboxes recovered from vehicles will be stored directly into the shipping containers. Most importantly, these containers will be stored within the building to avoid any environmental, visual and traffic impacts. In terms of transporting the containers off site, these would be transported from the warehouse to the truck once the vehicle arrives on site which would alleviate the need for moving recovered goods to multiple locations within the site and improve operational efficiency.

The above arrangement has been discussed with Council previously and it is our understanding that Council's Environmental Management Officer agrees to this approach and has not raised any concerns in relation to this proposed arrangement.

Additional Documents

Given the proposal no longer involves external storage of the recovered goods, the additional documents/details requested are not required. That said, for comprehensive assessment of the proposal, the following documents accompanies this letter:

1. An operational ***Plan of Management*** incorporating the recommendations of the following reports:

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- Fuel System Operation Plan
- Noise and Vibration Assessment
- Waste Contract
- Waste Management Plan
- Water Management Assessment

2. A copy of the **Sydney water trade waste agreement**

Oil/Grease Traps

The Proponent has discussed with Council's environmental management officer, Ahmad Faizi, regarding the oil/grease traps to clarify Council's concerns regarding certification of these. We understand Council has requested the information based on the recommendation of the water management plan. The report provides the following in relation to this:

Prior to the commencement of operations, the proponent should have the existing oil/grease trap cleaned out by a suitably qualified company, who should certify that the oil/grease trap is suitable for purpose, complies with relevant standards, and is in good working order.

Given this is required prior to the commencement of operations, the Proponent invites, as conditions of consent, the above requirement to be satisfied prior to the issue of occupation certificate.

Public Access

In terms of access to the general public, the site is proposed to be operated in a controlled arrangement for occupational health and safety reasons, with public access to the site restricted only to the administration building. Members of the public may access the site for the following reasons:

- Assessment of the vehicle to obtain an estimate for sale from the operator, and
- Sale/drop off car once the price is confirmed.

This will be undertaken on an appointment basis only. The cars will be parked in the parking area, adjacent to the building and no access will be provided to the working areas of the premises.

Water Management Assessment Report

In response to Council's comments, the water management report has been updated to remove comments regarding the Environmental Planning Licence and accompanies this letter.

2. Traffic Matters

Council's Traffic Engineer requested the following information to be submitted for Council assessment:

- dimensions of the loading zone
- Signs and line marking at the entry and exit driveways and on-site.



Amended drawings, prepared by Wayne Wilson, Drawing No. 18-127-07, Revision 2DA, accompanies this information.

Apart from this, Council's traffic engineer raised concerns regarding adequate manoeuvring area for the largest vehicle servicing the site (semi-trailers - 17m length) and requested turning path analysis for semi-trailers, to demonstrate that there is adequate manoeuvring area on site.

We note that this information was previously included in the traffic advice submitted to Council on 02 June 2020. Page 13 of the advice provides the swept path diagram for 17m long trucks.

Further, we have written to Council confirming the above and sought clarification on the additional documents and are awaiting a response.

3. Contamination Report

An email from Council dated 11 August 2020 requested amendments to the contamination report.

The Preliminary Site Investigation assessment has been updated to address the matters raised by Council and accompanies this letter.

We trust that the enclosed information will now enable the consent authority to continue with their assessment of this application. Should you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,



Vidhya Ramesh
Project Manager

