

NOTICE OF LOCAL PLANNING PANEL MEETING PUBLIC AGENDA

A Local Planning Panel meeting will be held via audio-visual means on Tuesday, 15 March 2022 at 3:30pm.

Brett Newman
CHIEF EXECUTIVE OFFICER



**CITY OF
PARRAMATTA**

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	<i>The City of Parramatta Council acknowledges the Burramattagal Clan of The Darug, the traditional custodians of Parramatta and pays its respects to the elders both past and present</i>	
2	WEBCASTING ANNOUNCEMENT	
	<i>This public meeting will be recorded. The recording will be archived and available on Council's website.</i>	
	<i>All care is taken to maintain your privacy; however if you are in attendance in the public gallery, you should be aware that your presence may be recorded.</i>	
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DEVELOPMENT APPLICATIONS

15 MARCH 2022

5.1	PUBLIC MEETING: 256 Kissing Point Road, DUNDAS VALLEY (Lot 10 DP 719923)	6
5.2	OUTSIDE PUBLIC MEETING: 37A Grand Avenue, CAMELLIA (Lot 2 DP 539890)	325

DEVELOPMENT APPLICATION

ITEM NUMBER	5.1
SUBJECT	PUBLIC MEETING: 256 Kissing Point Road, DUNDAS VALLEY (Lot 10 DP 719923)
DESCRIPTION	Demolition of existing carwash facility, construction of a new carwash facility. No proposed works to existing service station.
REFERENCE	DA/800/2021 - D08411414
APPLICANT/S	Jasbe Dundas Pty Ltd
OWNERS	256 Kissing Point Road Pty Ltd
REPORT OF	Group Manager Development and Traffic Services
RECOMMENDED	APPROVAL

DATE OF REPORT – 09/02/2022

REASON FOR REFERRAL TO LPP

The item is being referred to the Parramatta Local Planning Panel as more than 10 submissions were received (9 during the formal notification period and 6 submissions being received after the conclusion of the formal period).

EXECUTIVE SUMMARY

This is a summary of the full assessment of the application as outlined in Attachment 1, the Section 4.15 Assessment Report.

The proposed development involves the demolition of the existing automated car wash and associated infrastructure, and the construction of two (2) automated car wash bays, three (3) self-serve wash bays as well as four (4) vacuum bays. Acoustic mitigation measures, in the form of acoustic walls to the north and east boundaries of the proposed car wash areas also form part of the proposal.

The subject site and surrounding areas to the north are zoned as R2 Low Density Residential under the Parramatta Local Environmental Plan 2011. The proposed development falls under the definition of 'Service Station' which is prohibited in the R2 zone.

Notwithstanding, the existing car wash at the subject site was first granted Development Consent in 1991 and through subsequent approvals in improvements, it has continued to operate to the present time. Consequently, the subject site benefits from 'existing use rights' pursuant to Section 4.65 of the Environmental Planning and Assessment Act 1979. The proposed development is considered an enlargement of the existing car wash which is consistent with provisions contained in Clause 167 of the Environmental Planning and Assessment Regulation 2021.

The application was notified in accordance with Council's consolidated notification procedures. In response, nine (9) submissions were received during the formal period with six (6) submissions being received after the closing date. The key issues raised in the submissions received are listed as follows:

- Increase in traffic congestion
- Noise pollution/ambient acoustics
- Antisocial behavior

- Rubbish coming from the service station
- Loss of visual privacy
- Impact on vegetation on adjoining properties
- Loss of views
- Scope of the development within and R2 zone
- Light pollution.

The application was referred to internal departments including Council's Traffic & Transport Investigations Engineer, Environmental Health Team, Heritage Advisor and Development Engineer who raised no objection to the proposal, subject to conditions. The application was also referred to Transport for NSW pursuant to State Environmental Planning Policy (Transport and Infrastructure) 2021 of which, no objections have been raised, subject to the imposition of conditions.

The application was assessed having regard to the relevant environmental planning instruments including the Parramatta Local Environmental Plan 2011. The proposed development is considered to generally satisfy the requirements of the applicable planning instruments and the Parramatta Development Control Plan 2011 (DCP).

Having regard to the applicable planning provisions and notwithstanding the issues raised in the submissions, the proposal is considered satisfactory subject to conditions of consent.

RECOMMENDATION

- (a) **That** the Parramatta Local Planning Panel (PLPP), exercising the functions of Council, pursuant to Section 4.16(3) of the Environmental Planning and Assessment Act 1979, issue development consent to DA/800/2021- Demolition of existing carwash facility, construction of a new carwash facility on land at Lot 10 DP 719923, 256 Kissing Point Road, Dundas Valley NSW 2117.
- (b) **Further, that** objectors be advised of the Panel's decision.

REASONS FOR APPROVAL

1. The proposed development benefits from existing use rights and satisfies the requirements of all applicable planning controls.
2. The development will not create adverse impacts onto the locality and will remain compatible with the existing area.
3. The proposed development incorporates sufficient measures to safeguard the existing acoustic amenities.
4. For the reasons above, approval of the application is in the public interest.

Matthieu Santoso
Development Assessment Officer

ATTACHMENTS:

1	↓	Assessment Report & Draft Conditions	54 Pages
2	↓	Locality Plan	1 Page
3	↓	Plans used during Assessment (PLPP)	19 Pages
4	↓	Plan of Management	4 Pages
5	↓	BP Dundas Carwash EMP	118 Pages
6	↓	Traffic & Parking Impact Assessment	21 Pages
7	↓	SEPP 55 letter	39 Pages
8	↓	Arboricultural Impact Assessment	14 Pages
9	↓	Noise Assessment Report	24 Pages
10	↓	Statement of Environmental Effects	22 Pages

REFERENCE MATERIAL



City of Parramatta

File No: DA/800/2021

**SECTION 4.15 ASSESSMENT REPORT
PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011
ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979**

SUMMARY

DA No:	DA/800/2021
Property:	LOT 10 DP 719923, 256 Kissing Point Road, DUNDAS VALLEY NSW 2117
Proposal:	Demolition of existing carwash facility, construction of a new carwash facility. No proposed works to existing service station.
Date of receipt:	31 August 2021
Applicant:	JASBE DUNDAS PTY LTD
Owner:	Jasbe Dundas Pty Limited
Property owned by a Council employee or Councillor:	The site is not known to be owned by a Council employee or Councillor
Political donations/gifts disclosed:	None disclosed on the application form
Submissions received:	15
Recommendation:	Approval
Assessment Officer:	Matthieu Santoso

LEGISLATIVE REQUIREMENTS

Environmental Planning Instruments	<ul style="list-style-type: none"> • SEPP (Industry and Employment) 2021 – Advertising and Signage; • SEPP (Resilience and Hazards) 2021– Hazardous and Offensive Development; • SEPP (Resilience and Hazards) 2021– Remediation of Land; • SEPP (Transport and Infrastructure) 2021 (Infrastructure); • Parramatta Local Environmental Plan 2011; and • Parramatta Development Control Plan 2011.
Zoning	R2 Low Density Residential
Bushfire Prone Land	No
Heritage	No
Heritage Conservation Area	No
Integrated development	No
Clause 4.6 variation	No
Delegation	Parramatta Local Planning Panel

SITE DESCRIPTION AND CONDITIONS

The subject site is known as 256 Kissing Point Road, Dundas. The current property description is Lot 10 DP 719923. The site is an irregular allotment and has a moderate slope from the South-East to the North-West of approximately 5.94 metres over a distance of 109.53 metres.

The subject site has the following area and dimensions:

Area – 3,970 square metres

Frontage – 101.06 metres

Rear – 95.89 metres

East – 45.73metres

West – 24.87 metres

The site is zoned R2 Low Density Residential pursuant to the Parramatta Local Environmental Plan 2011. The subject site fronts an SP2 Infrastructure zone in the form of Kissing Point Road which is identified as a classified road by Transport for NSW (Roads). It is notable that the surrounding area to the north of the subject site is similarly zoned as R2 Low Density Residential.

The subject site currently accommodates a “service station” with ancillary services, notably an automated drive-through car wash.

It is located within an established residential area characterised by single storey, dual occupancy, and multi-dwelling developments. It is further notable that the thirty-seven (37) place childcare “Papilio” is located to the North-West of the Subject site (refer to figure 5).

Due to the COVID-19 situation, a physical site inspection was not undertaken however a virtual walkthrough was completed.



Figure 1. Aerial view of subject site (Source: Nearmaps)



Figure 2. Zoning Map (Source: Planning Portal)



Figure 3. View of site as viewed from Kissing Point Road (Source: Nearmaps).



Figure 4. Subject site as viewed from Quarry Road (Source: Nearmaps).

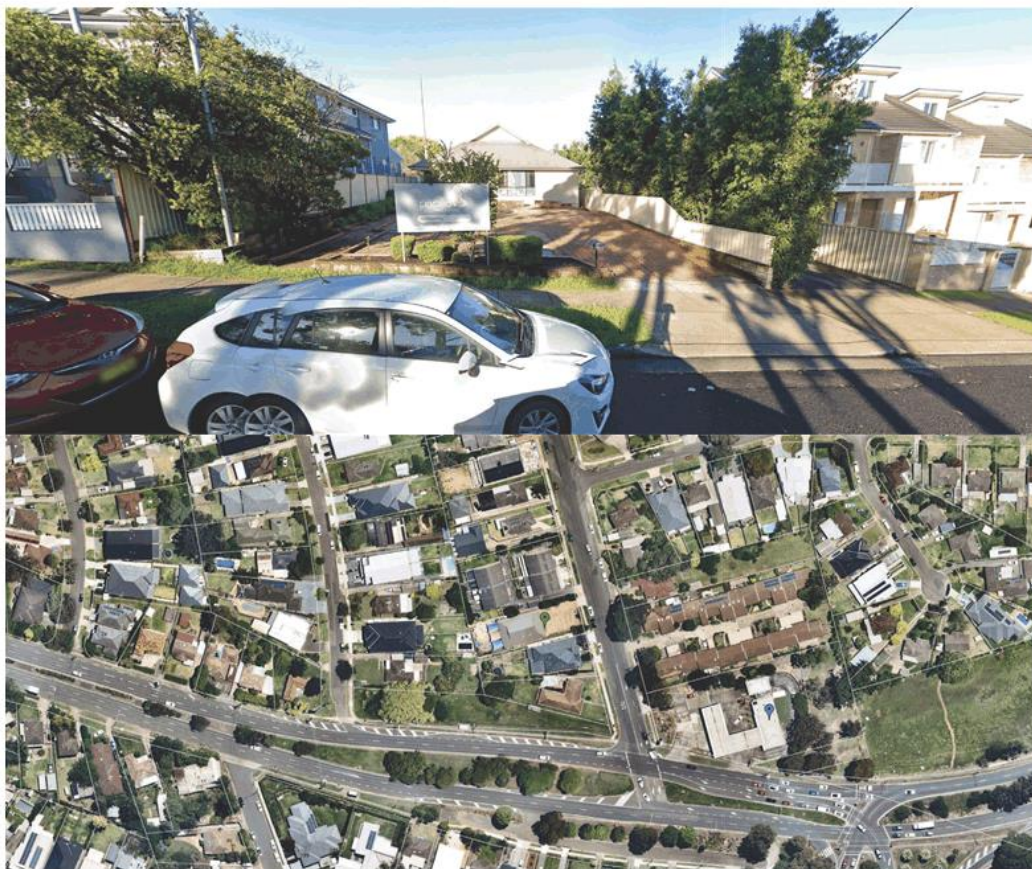


Figure 5. Location of Papilio's early learning centre in relation to the subject site (Source: Nearmaps).



Figure 6. View of existing boundary fencing (Source: Nearmaps)

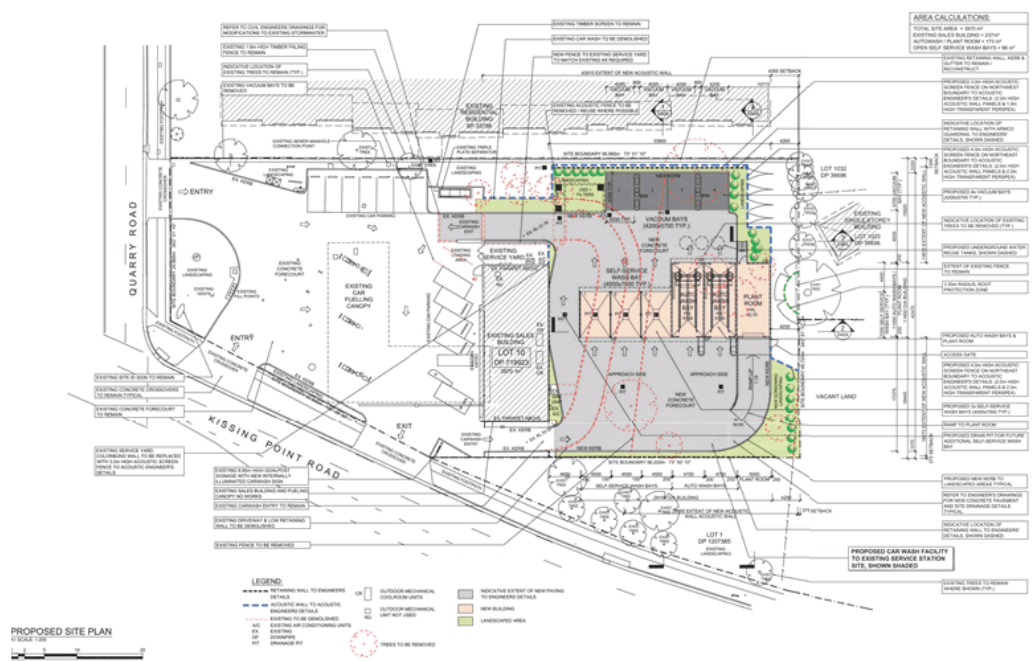


Figure 7. Proposed site plan by MCHP Architects dated 02/09/2020

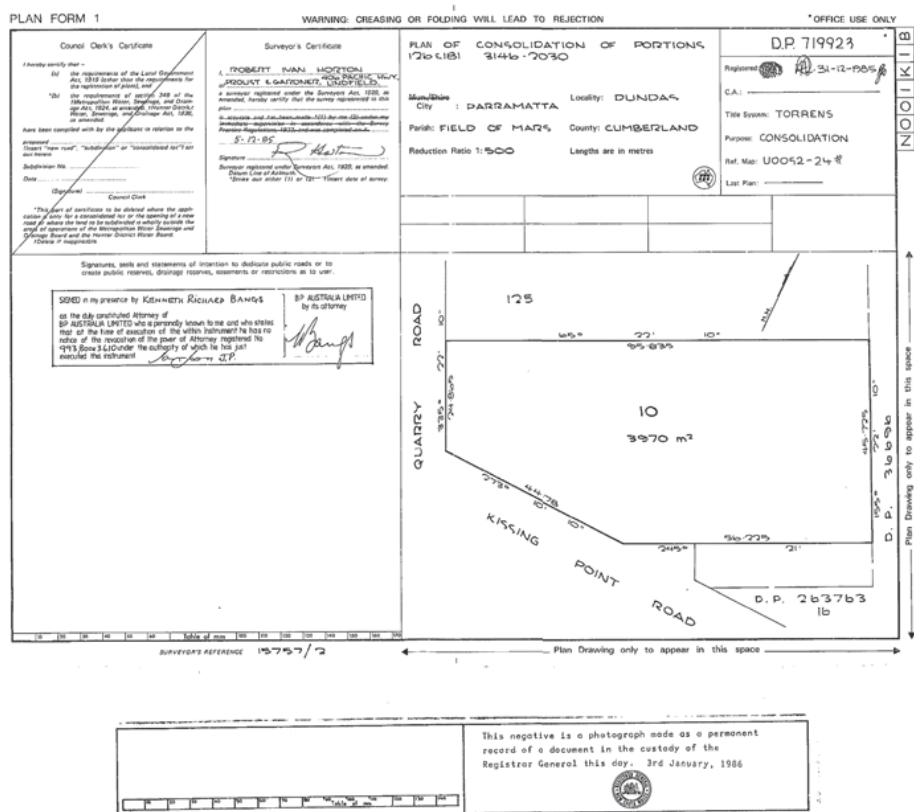


Figure 8. Deposited Plan No. 719923

SECTION 4.15 EVALUATION

THE PROPOSAL

The proposed development includes the following components:

Demolition

- Single automatic car wash building;
- Acoustic fence along northern boundary (to be replaced);
- Existing vacuum bays to be removed;
- Southern driveway and retaining wall (to be replaced); and
- Existing fence dividing vacant portion of site from existing operation

Construction

- New car wash facilitating comprising:
 - o 2x Automatic wash bays;
 - o 3x self-service wash bays;
 - o Plant room;
 - o 4x vacuum bays;
- Acoustic Mitigation fencing. (Located as per blue dotted line on Site Plan):
 - o A three (3) metre high acoustic wall (two (2) metre high acoustic panel + one (1) metre high transparent Perspex walls) are proposed to the north of the subject site adjacent to the car wash area with a setback of 1.3 metres to the property boundary.
 - o A four (4) metre high (two (2) metre acoustic panel + two (2) metre high transparent 'Perspex' wall) are sought on the eastern boundary of the Car wash space;
- Retaining walls (as indicated on plans – to engineers' details);
- New driveway to rear car wash facility;
- New concrete forecourt to car wash facility; and
- New ramp driveway to plant room.

Site works

- Remove and/or replace trees (as per site plans and addressed in the Arborist report);
- Grade and prepare site;
- New driveway to prepare car wash facility;
- New concrete forecourt to car wash facility;
- New OSD tank;
- New stormwater drainage of car wash area and street; and
- Landscaping (as per submitted plans).

Operation of the site

Service station: Existing hours: 24 hours per day, 7 days a week (No change to the service station trading hours);

Car wash: proposed trading hours (as recommended by the report prepared by Atkins Acoustic, dated September 2020);

- Automatic car wash/dryer bays – 7:00am – 10:00pm, Monday to Saturday, and 8:00am to 10:00pm Sundays and Public Holidays;

- Self-serve wash bays: 7:00am – 10:00pm, Monday to Saturday, and 8:00am to 10:00pm Sundays and Public Holidays; and
- Vacuum Bays – 7:00am – 10:00pm Monday to Saturday, and 8:00am – 10:00pm Sundays and Public Holidays.

Staff:

Service station and car wash: 2-3 (at any time of day).

Note: No additional business identification signage is proposed for the subject site.

PERMISSIBILITY

The site is zoned R2 Low Density Residential under Parramatta Local Environmental Plan 2011.

The proposed development falls under the definition of “Service Station” which outlined as follows:

“Service station means a building or place used for the sale by retail of fuels and lubricants for motor vehicles, whether or not the building or place is also used for any one or more of the following—

- (a) the ancillary sale by retail of spare parts and accessories for motor vehicles,*
- (b) the cleaning of motor vehicles,*
- (c) installation of accessories,*
- (d) inspecting, repairing and servicing of motor vehicles (other than body building, panel beating, spray painting, or chassis restoration),*
- (e) the ancillary retail selling or hiring of general merchandise or services or both.”*

It is noted that the definition of ‘service station’ does not have a parent term and is separately defined and therefore, is prohibited within an R2 Low Density Residential zone under the Parramatta Local Environmental Plan 2011.

Noting the permissibility of the development and the current zoning of the land, consideration of the provisions contained in Division 4.11 of the Environmental Planning and Assessment Act 1979 is discussed below:

Section 4.65 of the Environmental Planning and Assessment Act 1979 is noted as follows:

“4.65 Definition of “existing use”

(cf previous s 106)

In this Division, existing use means—

- (a) the use of a building, work or land for a lawful purpose immediately before the coming into force of an environmental planning instrument which would, but for this Division, have the effect of prohibiting that use, and*
- (b) the use of a building, work or land—*
 - (i) for which development consent was granted before the commencement of a provision of an environmental planning instrument having the effect of prohibiting the use, and*

- (ii) *that has been carried out, within one year after the date on which that provision commenced, in accordance with the terms of the consent and to such an extent as to ensure (apart from that provision) that the development consent would not lapse."*

With respect to the subject site, the history of the site is noted as follows:

<i>Application</i>	<i>Summary</i>
DA/38716/1991	Installation of a Car wash facility
BA/1299/1991	To modernise the existing BP service station
BA/234/1992	A new Carwash
BA/234/1992/A	A new metal clad Carwash
BA/46/1996	Underground tank installation
DA/40/1996	Installation on an Underground tank
BA/72/1996	Alterations to the interior of the existing BP Convenience store
DA/78/1996	Replacement panels to the existing signage
DA/68/1997	To install a 30kL underground tank and associated dispenser at the existing BP station
BA/154/1997	An underground LPG storage tank
BA/729/1997	New car-wash machine, new painting and vacuum units and new signage replacing existing
DA/3003/2002	Internal alterations and refurbishment of existing petrol station
DA/2195/2003	To provide roof over and enclosed with wall area 23m ²
TA/927/2007	Pruning of 4 tree/s
PL/9/2020	Carwash to residual land at rear of existing service station site

The subject site has been granted Development Consent for the purposes of a car wash in 1992 and 1997 and continues to operate at the site. As such, it is considered that the site enjoys 'existing use rights' for the purposes of Section 4.65 of the Environmental Planning and Assessment Act 1979.

The provisions of Section 4.66 of the Environmental Planning and Assessment Act 1979 are noted as follows:

"4.66 Continuance of and limitations on existing use

(cf previous s 107)

- (1) Except where expressly provided in this Act, nothing in this Act or an environmental planning instrument prevents the continuance of an existing use.*
- (2) Nothing in subsection (1) authorises—*
 - (a) any alteration or extension to or rebuilding of a building or work, or*
 - (b) any increase in the area of the use made of a building, work or land from the area actually physically and lawfully used immediately before the coming into operation of the instrument therein mentioned, or*
 - (c) without affecting paragraph (a) or (b), any enlargement or expansion or intensification of an existing use, or*
 - (d) the continuance of the use therein mentioned in breach of any consent in force under this Act in relation to that use or any condition imposed or applicable to that consent or in breach of any condition referred to in section 4.17(1)(b), or*

- (e) *the continuance of the use therein mentioned where that use is abandoned.*
- (3) *Without limiting the generality of subsection (2)(e), a use is to be presumed, unless the contrary is established, to be abandoned if it ceases to be actually so used for a continuous period of 12 months.*
- (4) *During the period commencing on 25 March 2020 and ending on 25 March 2022, the reference to 12 months in subsection (3) is taken to be a reference to 3 years."*

As discussed earlier in the report, the most recent development consent that had been granted to the existing car wash was in 1991. In the above consideration, the use of the building on as a 'Service Station' continues to operate at the site and has not been abandoned. As such, the site continues to enjoy 'existing use rights.'

Section 4.67 of the Environmental Planning and Assessment Act 1979, the following is noted:

"4.67 Regulations respecting existing use

(cf previous s 108)

- (1) *The regulations may make provision for or with respect to existing use and, in particular, for or with respect to—*
 - (a) *the carrying out of alterations or extensions to or the rebuilding of a building or work being used for an existing use, and*
 - (b) *the change of an existing use to another use, and*
 - (c) *the enlargement or expansion or intensification of an existing use.*
 - (d) *(Repealed)*
- (2) *The provisions (in this section referred to as **the incorporated provisions**) of any regulations in force for the purposes of subsection (1) are taken to be incorporated in every environmental planning instrument.*
- (3) *An environmental planning instrument may, in accordance with this Act, contain provisions extending, expanding or supplementing the incorporated provisions, but any provisions (other than incorporated provisions) in such an instrument that, but for this subsection, would derogate or have the effect of derogating from the incorporated provisions have no force or effect while the incorporated provisions remain in force.*
- (4) *Any right or authority granted by the incorporated provisions or any provisions of an environmental planning instrument extending, expanding or supplementing the incorporated provisions do not apply to or in respect of an existing use which commenced pursuant to a consent of the Minister under section 4.33 to a development application for consent to carry out prohibited development."*

The proposal seeks the demolition of the existing automatic car wash facility and construction of two (2) new automatic carwash facilities, four (4) vacuum bays and three (3) self-serve wash bays to the undeveloped land to the east of the existing service station. No increase to floor area forms part of the proposal.

The proposal seeks the enlargement of the car wash component at the site.

Section 4.68 of the Environmental Planning and Assessment Act 1979, the following is noted:

"4.68 Continuance of and limitations on other lawful uses

(cf previous s 109)

- (1) *Nothing in an environmental planning instrument operates so as to require consent to be obtained under this Act for the continuance of a use of a building, work or land for a lawful purpose for which it was being used immediately before the*

coming into force of the instrument or so as to prevent the continuance of that use except with consent under this Act being obtained.

- (2) Nothing in subsection (1) authorises—
- (a) any alteration or extension to or rebuilding of a building or work, or
 - (b) any increase in the area of the use made of a building, work or land from the area actually physically and lawfully used immediately before the coming into operation of the instrument therein mentioned, or
 - (c) without affecting paragraph (a) or (b), any enlargement or expansion or intensification of the use therein mentioned, or
 - (d) the continuance of the use therein mentioned in breach of any consent in force under this Act in relation to that use or any condition imposed or applicable to that consent or in breach of any condition referred to in section 4.17(1)(b), or
 - (e) the continuance of the use therein mentioned where that use is abandoned.
- (3) Without limiting the generality of subsection (2)(e), a use is presumed, unless the contrary is established, to be abandoned if it ceases to be actually so used for a continuous period of 12 months.
- (4) During the period commencing on 25 March 2020 and ending on 25 March 2022, the reference to 12 months in subsection (3) is taken to be a reference to 3 years.”

The existing Service Station continues to operate at the subject site.

Development Consent had been issued for a ‘Car Wash’ that was permitted with consent at the time of applicable zoning. As such, the existing development is a lawful purpose.

Section 4.70 of the Environmental Planning and Assessment Act 1979, the following is noted:

4.70 Saving of effect of existing consents

(cf previous s 109B)

- (1) Nothing in an environmental planning instrument prohibits, or requires a further development consent to authorise, the carrying out of development in accordance with a consent that has been granted and is in force.
- (2) This section—
- (a) applies to consents lawfully granted before or after the commencement of this Act, and
 - (b) does not prevent the lapsing, revocation or modification, in accordance with this Act, of a consent, and
 - (c) has effect despite anything to the contrary in section 4.66 or 4.68.
- (3) This section is taken to have commenced on the commencement of this Act.

Noted, the application seeks to enlarge the existing use.

Having regard to the above provisions, Part 7 Existing Uses in the Environmental Planning and Assessment Regulation 2021 consideration is made in respect to Clauses 162-167 as follows:

“163 Certain development allowed

- (1) An existing use may, subject to this Division—
- (a) be enlarged, expanded or intensified, or
 - (b) be altered or extended, or
 - (c) be rebuilt, or
 - (d) be changed to another use, but only if that other use is a use that may be carried out with or without development consent under the Act, or

- (e) if it is a commercial use—be changed to another commercial use (including a commercial use that would otherwise be prohibited under the Act), or
- (f) if it is a light industrial use—be changed to another light industrial use or a commercial use (including a light industrial use or commercial use that would otherwise be prohibited under the Act).
- (2) However, an existing use must not be changed under subclause (1)(e) or (f) unless that change—
 - (a) involves only alterations or additions that are minor in nature, and
 - (b) does not involve an increase of more than 10% in the floor space of the premises associated with the existing use, and
 - (c) does not involve the rebuilding of the premises associated with the existing use, and
 - (d) does not involve a significant intensification of that existing use.
 - (e) (Repealed)
- (3) In this clause—

commercial use means the use of a building, work or land for the purpose of office premises, business premises or retail premises (as those terms are defined in the Standard Instrument).

light industrial use means the use of a building, work or land for the purpose of light industry (within the meaning of the standard instrument set out in the [Standard Instrument \(Local Environmental Plans\) Order 2006](#)).

The proposal relies on existing use rights noting the current use of the site as a 'Service Station' which is a use which is prohibited in the R2 Low Density Residential zone.

The use for the purposes of a 'Service Station' is a separately defined land use and is not defined as a commercial use. Accordingly, the enlargement of the car wash is permitted with consent.

Consideration is made in respect to Clauses 164-167 of the Environmental Planning and Assessment Regulation 2021 as follows:

“164 Enlargement, expansion and intensification of existing uses

- (1) Development consent is required for any enlargement, expansion or intensification of an existing use.
- (2) The enlargement, expansion or intensification—
 - (a) must be for the existing use and for no other use, and
 - (b) must be carried out only on the land on which the existing use was carried out immediately before the relevant date.

165 Alteration or extension of buildings and works

- (1) Development consent is required for any alteration or extension of a building or work used for an existing use.
- (2) The alteration or extension—
 - (a) must be for the existing use of the building or work and for no other use, and
 - (b) must be erected or carried out only on the land on which the building or work was erected or carried out immediately before the relevant date.

166 Rebuilding of buildings and works

- (1) Development consent is required for any rebuilding of a building or work used for an existing use.
- (2) The rebuilding—

- (a) must be for the existing use of the building or work and for no other use, and*
- (b) must be carried out only on the land on which the building or work was erected or carried out immediately before the relevant date.*

167 Changes of existing uses

Development consent is required—

- (a) for any change of an existing use to another use, and*
- (b) in the case of a building, work or land that is used for different existing uses, for any change in the proportions in which the various parts of the building, work or land are used for those purposes.*

The subject site can be considered to enjoy 'existing use rights' and is considered an enlargement of the existing car wash facility and therefore, require development consent pursuant to Clause 164 of the Environmental Planning and Assessment Regulation 2021.

ZONE OBJECTIVES

- *To provide for the housing needs of the community within a low-density residential environment.*
- *To enable other land uses that provide facilities for services to meet the day to day needs of the residents.*
- *To ensure that non-residential land uses are located in a context and setting that minimises impacts on the amenity of a low-density residential environment.*
- *To allow for a range of community facilities to be provided to service the needs of residents, workers, and visitors in residential neighbourhoods.*

Whilst prohibited under the current plan, the proposed development remains consistent with several aims and objectives of the R2 – Low Density Residential zoning applying to the land.

ENVIRONMENTAL PLANNING INSTRUMENTS

STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

The proposed development seeks the intensification of the proposed car wash existing currently on the site. No portion of the service station's fuel storage or delivery systems are proposed to be altered under this application.

STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021 – REMEDIATION OF LAND

The area proposed to be developed to the East of the existing service station has no historical use associated with contamination.



Figure 9: Subject site from 1951 to 2009 (GIS)

A letter provided by Resolve Environmental dated 13/11/2020 has been submitted alongside groundwater test results to support the notion that the site is not subject to contamination.

The application was referred to Council Environmental Health Officer who raised no objections to the proposal, subject to conditions of consent.

In this regard, it is considered that the provision of clause 4.6 of SEPP (Resilience and Hazards) 2021 is satisfied and the land can be considered suitable for the development.

SYDNEY REGIONAL ENVIRONMENTAL PLAN (SYDNEY HARBOUR CATCHMENT) 2005 (DEEMED SEPP)

The site is not located on the foreshore or adjacent to a waterway and therefore, with the exception of the objective of improved water quality, the objectives of the SREP are not applicable to the proposed development. The development is consistent with the controls contained within the deemed SEPP.

STATE ENVIRONMENTAL PLANNING POLICY (TRANSPORT AND INFRASTRUCTURE) 2021 - INFRASTRUCTURE

The provisions of Chapter 2 of the SEPP have been considered in the assessment of the development application.

Clause	Comment
Electricity infrastructure	The subject site is not in the vicinity of electricity infrastructure that would trigger the concurrence of the electricity supply authority.
Development adjacent to rail corridors	The subject site is not adjacent to a rail corridor.
Frontage to a classified road	<p>The site has frontage to Kissing Point Road which is identified as a classified road.</p> <p>The proposed development does not seek to introduce any new access/exit points from the site.</p> <p>A referral was sent to Transport for NSW, who raised no objections to the proposal, subject to the imposition of conditions of consent.</p>
Traffic generating developments	A referral was sent to Transport for NSW who raised no objections to the proposal, subject to the imposition of conditions of consent.

COMPLIANCE TABLE – LOCAL ENVIRONMENTAL PLAN 2011

The relevant matters to be considered under Parramatta Local Environmental Plan 2011 for the proposed development are outlined below.

Development standard	Compliance
Height of Buildings Control: 9m Proposed: 5.2m	Yes, the proposed works involve the construction of a new undercover carwash space. No changes are sought to the existing service station sales building nor fuel storage/delivery bays.
Floor Space Ratio	The proposed development does not involve any areas that are considered to be defined as 'gross floor area.'
Development on land intended to be acquired for public purposes	The proposal is not identified on the map.
Architectural roof features	An architectural roof feature is not proposed.
Development below mean high water mark	The proposal is not for the development of land that is covered by tidal waters.
Heritage Conservation	N/A – the site is not considered to be a heritage item nor is it considered to fall under a heritage conservation area.

Aboriginal Places of Heritage significance	N/A
Acid sulphate soils	No major excavation is proposed.
Earthworks	The proposed works have been reviewed by both Council's engineering and Environmental health – contamination teams. No objections have been raised subject to the imposition of conditions of consent.
Flood planning	The site is not identified by council as being flood prone.
Biodiversity protection	The site is not identified on this map
Water protection	The site is not identified on this map
Development on landslide risk land	The site is not identified on this map.
Affected by a Foreshore Building Line	The site is not located in the foreshore area.
Bushfire Prone Land	The site is not identified on this map.

DRAFT PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2020

The Draft Parramatta Local Environmental Plan 2020 was placed on public exhibition from 31 August 2020 to 12 October 2020. The draft LEP will replace the five existing LEPs that apply within the Local Government Area and will be the primary legal planning document for guiding development and land use decisions made by Council.

LEP	Zoning	Height	FSR
Parramatta LEP 2011	R2 Low Density Residential	9m	0.5:1
Draft Parramatta LEP 2020	R2 Low Density Residential	9m	0.5:1

Whilst the draft LEP must be considered when assessing this application under Section 4.15(1)(a)(ii) of the Environmental Planning and Assessment Act 1979, the LEP is neither imminent nor certain and therefore limited weight has been placed on it.

The proposed development remains consistent with the objectives of the Draft LEP.

COMPLIANCE TABLE – DEVELOPMENT CONTROL PLAN 2011

The relevant matters to be considered under Parramatta Development Control Plan 2011 for the proposed development are outlined below.

Development Control	Compliance
Site considerations	
2.4.4 Land Contamination	Yes
Is the site identified as or likely to be contaminated?	The subject site is not currently listed as a contaminated land under the Contaminated Lands management Act 1997 by the EPA.

If yes, have the requirements of the SEPP been satisfied?	<p>The proposed work area is located within an undeveloped section of the site positioned to the east of the existing service station as well as its associated petroleum storage and handling equipment.</p> <p>A letter of support from Resolve Environmental dated 13 November 2020 as well as associated groundwater testing evidence has been provided to demonstrate that the work area has no evidence of being previously contaminated.</p> <p>A referral was sent to Council's Environmental Health Officer who raised no objections subject to the imposition of conditions of consent.</p>
2.4.5 Air quality	<p>Yes, via conditions of consent</p> <p>Note: standard conditions of consent are recommended to ensure that the potential for increased air pollution has been minimised from the proposed use.</p>
3.2. Building Elements	
Side and rear setbacks	<p>Yes</p> <p>A merit-based approach based on the requirements of developments commonly situated within an R2 Low Density Residential setting had been used to provide direction on appropriate setbacks.</p> <p>A building setback of 15.52m has been provided to the rear of the proposed auto wash bay. A new kerb is proposed to be installed to the north of the subject site in line with the existing parking spaces to the northwest of the site. As these (4) spaces are proposed to be vacuum bays, a three (3) metre high acoustic wall (two (2) metre high acoustic panel + one (1) metre high transparent Perspex walls) are proposed to the north of the subject site adjacent to the car wash area with a setback of 1.3 metres to the property boundary.</p> <p>Furthermore, a four (4) metre high (two (2) metre acoustic panel + two (2) metre high transparent 'Perspex' wall) is sought on the eastern boundary of the car wash space to mitigate acoustic impact to residential properties located on Pedrick Place to the northeast. The proposed plant room shares a side setback of 4.27m with a majority of the acoustic fencing along the eastern boundary with the fencing tapering off to a zero setback on the site's South-West area.</p> <p>The proposed setbacks established by the proposed structures are considered to be acceptable given that they are located within the centre of the subject site and with appropriate acoustic mitigation measures. The use of transparent 'Perspex' on the proposed acoustic walls provides sufficient acoustic treating whilst reducing the overall scale of the wall. Moreover, the structures itself are not fully enclosed and would not create any unreasonable bulk to adjoining areas ensuring that the visual relationship between existing residential areas and the service station site is not excessive in respect to bulk and scale.</p>

	<p>Additionally, the subject site is located to the south of any residential property and any shadows created by the proposed acoustic walls will fall entirely on the subject site.</p> <p>In this respect, the proposed setbacks are unlikely to cause an adverse impacts and are supported on its merits.</p>
3.3 Environmental Amenity	
3.3.4 Acoustic Amenity	<p>The proposal seeks to operate the car wash with the following hours:</p> <p>7:00am to 10:00pm weekdays; and 8:00am – 10:00pm weekends and public holidays.</p> <p>An acoustic report prepared by Atkin Acoustics dated September 2020 had been submitted which proposes the construction of 3-4m high acoustic walls alongside the Northern and Eastern perimeter of the proposed car wash space amongst other noise mitigation measures.</p> <p>Council's Environmental Health Officer had reviewed the submitted information and raised no objections to the development, subject to conditions of consent.</p>
3.3.6 Water Sensitive Urban Design	<p>Yes, the proposal is accompanied by a stormwater management plan. Council's development engineers have raised no objections to the development subject to conditions of consent.</p>
3.3.7 Waste Management	<p>Yes, the submitted waste management plans is considered to be satisfactory. Conditions are recommended to ensure the recommendations of the WMP are adopted appropriately.</p>
3.4 Social Amenity	
3.4.4 Safety and Security	<p>Yes, the development is in accordance with crime prevention principles as it permits adequate natural surveillance whilst improving site security (refer to figure 3).</p> <p>Whilst the existing service station seeks to remain operational 24 hours a day, it is recommended that the proposed car wash area be inaccessible to the public after the prescribed hours.</p> <p>A condition of consent for the above is recommended to be imposed for the hours of operation and limited access to the car wash area after hours.</p>
3.6 Parking Provision	
3.6.2 Parking and Vehicular Access	<p>The Parramatta DCP 2011 and RMS Guide to Traffic Generating Development does not specify parking requirements for a car wash facility.</p> <p>It is considered that the car wash facility would not generate a parking demand as it is expected customers will only leave their vehicle to wash and vacuum and leave after they have completed the cleaning of their vehicle.</p>

	<p>Furthermore, no changes are proposed to the existing service station and convenience store and therefore, there would be no loss of parking as a result of this development.</p> <p>Accordingly, it is considered that the proposal would not adversely impact on existing access or parking at the subject site.</p>
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REFERRALS

Internal Referrals	Comment
Development Engineer	<input type="checkbox"/> Supported subject to conditions
Heritage	<input type="checkbox"/> Supported subject to conditions
Traffic and Transport	<input type="checkbox"/> Supported subject to conditions
Environmental Health – Contamination	<input type="checkbox"/> Supported subject to conditions
Environmental Health - Acoustic	<input type="checkbox"/> Supported subject to conditions
External Referrals	Comments
Transport for NSW	<input type="checkbox"/> Supported subject to conditions

PUBLIC CONSULTATION

The application was notified in accordance with Council's consolidated notification procedures. In response fifteen (15) unique submissions were received. The issues raised within those submissions are addressed below and have been grouped to avoid repetition:

Issue	Response
Increase in traffic congestion	<p>The application has been accompanied with a Traffic and Parking Impact Assessment Report in support of the application. While the use would attract some additional vehicle movements, it is considered that would not cause any adverse impact to the surrounding road network.</p> <p>It is noted that both TFNSW and Council's Traffic Engineer have raised no objections to the proposed development subject to conditions of consent.</p>
Noise pollution/ambient Acoustics	<p>The applicant has submitted an acoustic report as part of the application. Council's Environmental Health Officer had reviewed the application and raised no objections subject to conditions of consent.</p> <p>Mitigation measures have been proposed involving the installation of acoustic walls alongside the northern and eastern boundaries of the subject site</p>

Antisocial behaviour	<p>As part of the proposed operating hours, a condition of consent has been included to ensure that the use of tools/infrastructure associated with the proposed car wash cease and remain unavailable to the public outside of the hours of operation for the car wash.</p> <p>The submitted plan of management denotes general guidelines which are to be practiced by all employees to deter anti-social behaviour.</p>
Rubbish coming from the service station	Any reported incidents of rubbish being found on neighbouring properties are to be reported to the onsite manager and required to be recorded on the complaints register.
Loss of visual privacy	<p>Acoustic walls up to 3 metres in height are proposed in addition to the existing 1.8m high boundary fence alongside the northern boundary of the proposed car wash area.</p> <p>It is noted that no further works are proposed to the service station forecourt and canopy areas.</p>
Impact on vegetation on adjoining properties	<p>The submitted arborist report denotes several trees worthy of retention on the adjoining property, alongside steps to ensure that these are not damaged throughout the construction process.</p> <p>Council's Landscape and Tree Officer had reviewed the proposed works and raised no objections subject to conditions of consent.</p>
Loss of views	The subject site is not considered to be mapped within any view corridors. It is noted that the subject site is on the higher topographical plane as compared to adjoining residences to the North of the subject site.
Scope of the development in an R2 zone	<p>The subject site benefits from 'existing use rights' pursuant to Section 4.65 of the Environmental Planning and Assessment Act 1979. In this respect, the proposed development is permitted with consent as detailed in the 'existing use rights' assessment previously in this report.</p> <p>While it is noted that the proposed use is located adjacent to existing residential areas, noting the hours of operation sought together with the installation of physical acoustic measures including walls and operational management practices, it is not considered that the proposal will pose an unreasonable amenity impost on the surrounding dwellings.</p>
Light pollution	<p>All perimeter lighting and car wash lights (with the exception of security lighting) is proposed to be turned off when the car wash is not in operation. It is noted that the existing service station is operational 24 hours a day.</p> <p>A condition is to be imposed requiring lighting to be switched off when the use is not in operation and that any lights installed are to be</p>

	directed and focused to prevent unreasonable light spillage to residential properties.
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Amended Plans

N/A

DEVELOPMENT CONTRIBUTIONS

As the cost of works for the works exceeds \$100,000 a Section 7.12 development contribution of 1.0% (Greater than \$200,000) is required to be paid. The former contribution plan – City of Parramatta Section 94A (s7.12) Development Contribution Plan – Amendment No. 5, applies to this application as the application was lodged prior to the adoption of City of Parramatta (Outside Parramatta CBD) Contributions Plan 2021 (20 September 2021).

A standard condition of consent has been imposed requiring the contribution to be paid prior to the issue of a Construction Certificate.

BONDS

In accordance with Council's Schedule of Fees and Charges, the developer will be obliged to pay Security Bonds to ensure the protection of civil infrastructure located in the public domain adjacent to the site.

EP&A REGULATION 2000

Applicable Regulation considerations including demolition, fire safety, fire upgrades, compliance with the Building Code of Australia, compliance with the Home Building Act, PCA appointment, notice of commencement of works, sign on work sites, critical stage inspections and records of inspection have been addressed by appropriate consent conditions, refer to Appendix 1.

CONCLUSION**Conditional consent**

After consideration of the development against Section 4.15 of the Environmental Planning and Assessment Act 1979, and the relevant statutory and policy provisions, the proposal is suitable for the site and is in the public interest.

Therefore, it is recommended that the application be approved subject to conditions.

RECOMMENDATION**Approval subject to conditions**

Pursuant to Section 4.16(1a) of the Environmental Planning and Assessment Act, 1979:

- (a) That the Parramatta Local Planning Panel (PLPP), exercising the functions of Council, pursuant to Section 4.16(1a) of the Environmental Planning and Assessment Act 1979, issue a conditional consent to DA/800/2021- Demolition of existing carwash facility, construction of a new carwash facility on land at Lot 10 DP 719923, 256 Kissing Point Road, Dundas Valley NSW 2117.

The reasons for approval are:

1. The proposed development benefits from existing use rights and satisfies the requirements of all applicable planning controls.
2. The development will not create adverse impacts onto the locality and will remain compatible with the existing area.
3. The proposed development incorporates sufficient measures to safeguard the existing acoustic amenities.

For the reasons above, approval of the application is in the public interest.

(b) Further, that objectors be advised of the Panel's decision

“Appendix 4” to Section 4.15 Assessment Report - DA/800/2021**DRAFT DEFERRED COMMENCEMENT CONDITIONS**

Development Consent No.: DA/800/2021
 Property Address: LOT 10 DP 719923
 256 Kissing Point Road, DUNDAS VALLEY
 NSW 2117

PART A – GENERAL CONDITIONS**PA0001 #Approved Plans & Support Doc(DIEP Mandatory Cond)**

1. Development must be carried out in accordance with the following approved plans and supporting documentation (stamped by Council), except where the conditions of this consent expressly require otherwise:

Architectural Drawings (Project No.DA/800/2021)

Drawing/Plan No.	Issue	Plan Title	Dated
19-085 DA01	B	Proposed Site Plan	07/09/2020
19-085 DA02	B	Car wash bays plan	02/09/2020
19-085 DA03	B	Car wash elevations	02/09/2020
19-085 DA04	B	Site sections	02/09/2020

Civil Drawings/Stormwater (Project No.DA/800/2021)

Drawing/Plan No.	Issue	Plan Title	Dated
20506_DA_C100	04	Detail Plan	24/11/2021
20506_DA_C200	02	Stormwater Miscellaneous Details and Pit Lid Schedule	09/09/2020
20506_DA_C201	03	OSD Details and Sections	25/11/2021
20506_DA_C250	01	Stormwater Catchment Plan	09/09/2020
20506_DA_SE01	02	Sediment and Erosion Control Plan	09/09/2020
20506_DA_SE02	01	Sediment and Erosion Control Details	14/08/2020

Landscape Drawings (Project No.DA/800/2021)

Drawing/Plan No.	Issue	Plan Title	Dated
LA01	B	Tree retention and removal plan	22/09/2020

LA02	B	Landscape Plan	22/09/2020
LA03	B	Typical Details	22/09/2020

Specialist Reports

Document	Ref No.	Issue	Prepared By	Dated
Statement of Environmental Effects	-	-	DM Planning	September 2020
Waste Management Plan	-	-	MCHP Architects	21/09/2020
Traffic and parking assessment	20114	B	Traffic and Transport Planning Associates	September 2020
Acoustic report	-	-	Atkins Acoustics and Associates Pty Ltd	September 2020
Arborcultural impact assessment report	-	-	Alexis Anderson OBO Bluegum Tree care and consultancy	September 2020
SEPP 55 Statement Letter	001004-007	-	Resolve Environmental Pty Ltd	13/11/2020
Environmental Management Plan	P01004-009	1	S Holland	16/08/2021
Plan of management	-	-	-	N/D

In the event of any inconsistency between the approved plans and the supporting documentation, the approved plans prevail. In the event of any inconsistency between the approved plans and a condition of consent, the condition prevails.

Note: An inconsistency occurs between an approved plan and supporting documentation or between an approved plan and a condition when it is not possible to comply with both at the relevant time.

Reason: To ensure all parties are aware of the approved plans and supporting documentation that applies to the development

PA0002 Building work in compliance with BCA

1. All building work must be carried out in accordance with the current provisions of the Building Code of Australia (National Construction Code).
Reason: To comply with the Environmental Planning & Assessment Act 1979, as amended and the Environmental Planning & Assessment Regulation 2000.

PA0003 Construction Certificate

2. Prior to commencement of any construction works associated with the approved development (including excavation if applicable), it is mandatory to obtain a Construction Certificate. Plans, specifications and relevant documentation accompanying the Construction Certificate must include any requirements imposed by conditions of this Development Consent.
Reason: To ensure compliance with legislative requirements.

PA0004 No encroachment on Council and/or Adjoining proper

3. The development must be constructed within the confines of the property boundary. No portion of the proposed structure, including footings/slabs, gates and doors during opening and closing operations must encroach upon Council's footpath area or the boundaries of the adjacent properties.
Reason: To ensure no injury is caused to persons and the building is erected in accordance with the approval granted within the boundaries of the site.

PA0011 #Demolition of Buildings

4. Approval is granted for the demolition of existing car wash facility and associated infrastructure approved under this consent currently on the property, subject to compliance with the following: -
 - (a) Demolition is to be carried out in accordance with the applicable provisions of Australian Standard AS2601-2001 - Demolition of Structures.
Note: Developers are reminded that WorkCover requires that all plant and equipment used in demolition work must comply with the relevant Australian Standards and manufacturer specifications.
 - (b) The developer is to notify owners and occupiers of premises on either side, opposite and at the rear of the development site 5 working days prior to demolition commencing. Such notification is to be a clearly written on A4 size paper giving the date demolition will commence and is to be placed in the letterbox of every premises (including every residential flat or unit, if any). The demolition must not commence prior to the date stated in the notification.
 - (c) 5 working days (i.e., Monday to Friday with the exclusion of Public Holidays) notice in writing is to be given to City of Parramatta for inspection of the site prior to the commencement of works. Such written notice is to include the date when demolition will commence and details of the name, address, business hours, contact telephone number and licence number of the demolisher. Works are not to

commence prior to Council's inspection and works must also not commence prior to the commencement date nominated in the written notice.

- (d) On the first day of demolition, work is not to commence until City of Parramatta has inspected the site. Should the building to be demolished be found to be wholly or partly clad with asbestos cement, approval to commence demolition will not be given until Council is satisfied that all measures are in place so as to comply with Work Cover's document "Your Guide to Working with Asbestos", and demolition works must at all times comply with its requirements.
- (e) On demolition sites where buildings to be demolished contain asbestos cement, a standard commercially manufactured sign containing the words "DANGER ASBESTOS REMOVAL IN PROGRESS" measuring not less than 400mm x 300mm is to be erected in a prominent visible position on the site to the satisfaction of Council's officers. The sign is to be erected prior to demolition work commencing and is to remain in place until such time as all asbestos cement has been removed from the site to an approved waste facility. This condition is imposed for the purpose of worker and public safety and to ensure compliance with Clause 259(2)(c) of the Occupational Health and Safety Regulation 2001.
- (f) Demolition must not commence until all trees required to be retained are protected in accordance with the conditions detailed under "Prior to Works Commencing" in this Consent.
- (g) All previously connected services are to be appropriately disconnected as part of the demolition works. The applicant is obliged to consult with the various service authorities regarding their requirements for the disconnection of services.
- (h) Prior to the commencement of any demolition works, and where the site ceases to be occupied during works, the property owner must notify Council to discontinue the domestic waste service and to collect any garbage and recycling bins from any dwelling/ building that is to be demolished. Waste service charges will continue to be charged where this is not done. Construction and/ or demolition workers are not permitted to use Council's domestic waste service for the disposal of any waste.
- (i) Demolition works involving the removal and disposal of asbestos cement in excess of 10 square meters, must only be undertaken by contractors who hold a current WorkCover "Demolition Licence" and a current WorkCover "Class 2 (Restricted) Asbestos Licence".
- (j) Demolition is to be completed within 5 days of commencement.
- (k) Demolition works are restricted to Monday to Friday between the hours of 7.00am to 5.00pm. No demolition works are to be undertaken on Saturdays, Sundays or Public Holidays.
- (l) 1.8m high Protective fencing is to be installed to prevent public access to the site.

- (m) A pedestrian and Traffic Management Plan must be submitted to the satisfaction of Council prior to commencement of demolition and/or excavation. It must include details of the:
 - (i) Proposed ingress and egress of vehicles to and from the construction site;
 - (ii) Proposed protection of pedestrians adjacent to the site;
 - (iii) Proposed pedestrian management whilst vehicles are entering and leaving the site.
- (n) All asbestos laden waste, including asbestos cement flat and corrugated sheets must be disposed of at a tipping facility licensed by the NSW Environment Protection Authority (EPA).
- (o) Before demolition works begin, adequate toilet facilities are to be provided.
- (p) After completion, the applicant must notify City of Parramatta within 7 days to assess the site and ensure compliance with AS2601-2001 – Demolition of Structures.
- (q) Within 14 days of completion of demolition, the applicant must submit to Council:
 - (i) An asbestos clearance certificate issued by a suitably qualified person if asbestos was removed from the site; and
 - (ii) A signed statement verifying that demolition work and the recycling of materials was undertaken in accordance with the Waste Management Plan approved with this consent. In reviewing such documentation Council will require the provision of original.
 - (iii) Payment of fees in accordance with Council's current schedule of fees and charges for inspection by Parramatta Council of the demolition site prior to commencement of any demolition works and after the completion of the demolition works.

Reason: To protect the amenity of the area.

PA0013 #LSL Payment Const> \$25,000 (DIEP Mandatory Cond)

5. Before the issue of a construction certificate, the applicant is to ensure that the person liable pays the long service levy as calculated at the date of this consent to the Long Service Corporation or Council under section 34 of the Building and Construction Industry Long Service Payments Act 1986 and provides proof of this payment to the certifier.

Note: The Long Service Levy is to be paid directly to the **Long Service Corporation** at www.longservice.nsw.gov.au. For more information, please contact the Levy support team on 13 14 41.

Reason: To ensure that the long service levy is paid.

LA0001 #Tree Retention

6. Trees to be retained are:

Tree No.	Name	Common Name	Location	Tree Protection Zone (m)
1	<i>Corymbia citriodora</i>	Lemon Scented Gum	Adjoining property	6.0
2	<i>Quercus robur</i>	English Oak	Adjoining property	4.2
3	<i>Jacaranda mimosifolia</i>	Jacaranda	Adjoining property	3.8
13	<i>Leptospermum petersonii</i>	Lemon scented Tea tree	Adjoining property	2.0
14	<i>Callistemon viminalis</i>	Weeping Bottlebrush	Adjoining property	2.0
15	<i>Eucalyptus saligna</i>	Sydney Blue Gum	Adjoining property	12.0
19 – 26	<i>Corymbia maculata</i>	Spotted Gum	Rear setback	6.5

Reason: To protect significant trees which contribute to the landscape character of the area.

LA0002 #Demolition & tree removal (Delete N/A Councils)

7. **Parramatta** - Trees equal to or greater than five (5) metres in height, which are protected under City of Parramatta Council Development Control Plan 2011 (Part 5.4 Preservation of Trees or Vegetation), must not be removed or damaged without Council consent.

Reason: To preserve existing landscape features.

ECANSC Non-standard - General Matters

8. Following the preparation of the validation report, Council will require that the applicant engage an accredited auditor under the *Contaminated Land Management Act 1997* to review the Validation Report prepared by the contaminated land consultant and issue a **Site Audit Statement**. The accredited auditor shall consult with Council prior to finalising and issuing the Site Audit Statement. The Site Audit Statement should allow for soil access to occur to ground level courtyards and communal open space areas within the development. The accredited auditor shall provide Council with a copy of the Site Audit Report and Site Audit Statement, prior to the issuing of the Occupation Certificate. In circumstances where the SAS conditions (if applicable) are not consistent with the consent, the consent shall prevail to the extent of the inconsistency and a Section 96 Application or further Development Application pursuant to the *Environmental Planning and Assessment Act 1979* will be required.

Reason: To ensure that the development complies with the Remedial Action Plan and that the works are in accordance with the *Contaminated Land Management Act 1997*

ECA0002 Site Investigation & Site Audit Statement

9. Following demolition activities, the soil must be tested by a person with suitable expertise, to ensure the soil contaminant levels are below acceptable health criteria for residential areas. The soil investigation shall be carried out in accordance with the NSW Environment Protection Authority's Guidelines for Consultants Reporting on Contaminated Sites and the NSW Department of Environment and Conservation Guidelines for the Assessment and Management of Groundwater Contamination 2007.

A site audit statement shall be issued at the completion of the investigation by an approved NSW Environment Protection Authority Auditor in accordance with the NSW Environment Protection Authority's Guidelines for the NSW Site Auditor Scheme.

Reason: To ensure that the land is suitable for its proposed sensitive use and poses no risk to the environment and human health.

ECA0001 Hazardous/intractable waste disposed legislation

10. Hazardous or intractable wastes arising from the demolition process shall be removed and disposed of in accordance with the requirements of Safework NSW and the EPA, and with the provisions of:
 - a) Work Health and Safety Act 2011;
 - b) NSW Protection Of the Environment Operations Act 1997 (NSW); and
 - c) NSW Environment Protection Authority (EPA) Waste Classification Guidelines.

Reason: To ensure that the land is suitable for the proposed development and any contaminating material required to be removed from the property is removed in accordance with the prescribed manner.

ECA0004 Imported fill

11. All fill imported onto the site shall be validated to ensure the imported fill is suitable for the proposed land use from a contamination perspective. Fill imported on to the site shall also be compatible with the existing soil characteristic for site drainage purposes.

Council may require details of appropriate validation of imported fill material to be submitted with any application for future development of the site. Hence all fill imported onto the site should be validated by either one or both of the following methods during remediation works:

- (a) Imported fill should be accompanied by documentation from the supplier which certifies that the material is not contaminated based upon analyses of the material for the known past history of the site

where the material is obtained; and/or

- (b) Sampling and analysis of the fill material shall be conducted in accordance with NSW EPA (1995) Sampling Design Guidelines.

Reason: To ensure imported fill is of an acceptable standard.

ECA0005 Signage – Contamination

12. A sign displaying the contact details of the remediation shall be displayed on the site adjacent to the site access. This sign shall be displayed throughout the duration of the remediation works.

Reason: To provide contact details for council inspectors and for the public to report any incidents.

ECA0006 Require to notify about new contamination evidence

13. Any new information which comes to light during remediation, demolition or construction works which has the potential to alter previous conclusions about site contamination shall be notified to the Council and the principal certifying authority immediately.

Reason: To ensure that the land is suitable for its proposed use and poses no risk to the environment and human health.

ECA0007 Discharge of Contaminated Groundwater

14. Groundwater shall be analysed for pH and any contaminants of concern identified during the preliminary or detailed site investigation, prior to discharge to the stormwater system. The analytical results must comply with relevant NSW EPA water quality standards and Australian and New Zealand Guidelines for Fresh and Marine Water Quality.

Other options for the disposal of groundwater include disposal to sewer with prior approval from Sydney Water or off-site disposal by a liquid waste transporter for treatment/disposal to an appropriate waste treatment/processing facility.

Reason: To ensure that contaminated groundwater does not impact upon waterways.

ECA0009 Contaminated waste to licensed EPA landfill

15. Any contamination material to be removed from the site shall be disposed of to an EPA licensed landfill.

Reason: To comply with the statutory requirements of the Protection of the Environment Operations Act 1997.

ECA0011 Require. for removal of underground storage tanks

16. Following excavation and removal of any underground storage tank, the land shall be assessed in accordance with the NSW Environment Protection Authority's Technical Note: Investigation of Service Station Sites (2014). A report on the investigation is to be supplied to Council's Environment and Public Health Unit.

At the completion of the investigation, a site audit statement shall be issued by an approved NSW Environment Protection Authority Auditor in accordance with the NSW Environment Protection Authority's Guidelines for the NSW Site Auditor Scheme.

Reason: To ensure that the land is left in a safe and healthy condition.

ECA0013 Registration Covenant - encapsulated contamination

17. A covenant shall be registered on the title of the land and a copy of the title submitted to Council and the principal certifying authority prior to the issue of an occupation certificate, giving notice of the former use and contamination of the site and the existence of the encapsulated cells containing contaminated material.

Reason: To ensure that the encapsulated cell is not breached and to prevent the future occurrence of a health hazard and the spread of contamination.

ECA0014 Registration of covenant for ongoing management

18. A covenant shall be registered on the title of the land binding the owners and future owners to be responsible for ongoing maintenance, management and any future rehabilitation works required in terms of the contamination present, including the discharge or prevention of discharge from any contaminants or for any works required by the Environment Protection Authority.

Reason: To ensure that the encapsulated cell is not breached and to prevent the future occurrence of a health hazard and the spread of contamination.

PART B – BEFORE THE ISSUE OF A CONSTRUCTION CERTIFICATE

(Note: Some conditions contained in other sections of this consent (including prior to occupation/use commencing) may need to be considered when preparing detailed drawings/specifications for the Construction Certificate.)

PB0038 Security Bonds

19. In accordance with Section 4.17(6) of the Environmental Planning and Assessment Act 1979, security bonds payable to Council for the protection of the adjacent road pavement and public assets during construction works. The bond(s) are to be lodged with Council prior to the issue of any application/approval associated with the allotment, (being a Hoarding application, Construction Certificate) and prior to any demolition works being carried out where a Construction Certificate is not required.

The bond may be paid, by EFTPOS, bank cheque, or be an unconditional bank guarantee.

Should a bank guarantee be lodged it must:

- (a) Have no expiry date;

- (b) Be forwarded directly from the issuing bank with a cover letter that refers to Development Consent DA/800/2021;
- (c) Specifically reference the items and amounts being guaranteed. If a single bank guarantee is submitted for multiple items it must be itemised.

Should it become necessary for Council to uplift the bank guarantee, notice in writing will be forwarded to the applicant fourteen days prior to such action being taken. No bank guarantee will be accepted that has been issued directly by the applicant.

Bonds shall be provided as follows:

Bond Type	Amount
Nature Strip and Roadway: <i>Applies to all developments with a cost greater than \$25K and swimming pools regardless of cost (fee is per street frontage). See current Schedule of Fees and Charges.</i>	\$25,750.00

A dilapidation report is required to be prepared and submitted electronically to the City of Parramatta Council (council@cityofparramatta.nsw.gov.au) prior to any work or demolition commencing and with the payment of the bond/s.

The dilapidation report is required to document/record any existing damage to kerbs, footpaths, roads, nature strips, street trees and furniture within street frontage/s bounding the site up to and including the centre of the road.

Reason: To safe guard the public assets of council and to ensure that these assets are repaired/maintained in a timely manner so as not to cause any disruption or possible accidents to the public.

PB0020 #Parra Develop Contrib. Plan – Outside City Centre

20. A monetary contribution comprising **\$17,040.00** is payable to City of Parramatta Council in accordance with Section 7.12 of the Environmental Planning and Assessment Act 1979 and the *Parramatta Section 94A Development Contributions Plan (Amendment No. 5)*. Payment must be by EFTPOS, bank cheque or credit card only.

The contribution is to be paid to Council prior to the issue of a construction certificate.

The contribution levy is subject to indexation on a quarterly basis in accordance with movements in the Consumer Price Index (All Groups Index) for Sydney issued by the Australian Statistician. At the time of payment, the contribution levy may have been the subject of indexation.

Parramatta Section 94A Development Contributions Plan (Amendment No. 5) can be viewed on Council's website at: <https://www.cityofparramatta.nsw.gov.au/business-development/planning/development-contributions>

Reason: To comply with legislative requirements and to provide for the increased demand for public amenities and services resulting from the development.

PB0030 Infrastructure & Restoration Adm. fee for all DAs

21. An Infrastructure and Restoration Administration Fee must be paid to Council prior to the issue of a Construction Certificate.
The fee will be in accordance with Council's adopted 'Fees and Charges' at the time of payment.

Note: Council's Customer Service Team can advise of the current fee and can be contacted on 9806 5524.

Reason: To comply with Council's adopted Fees and Charges Document and to ensure compliance with conditions of consent.

TB0001 #Car Parking Condition

22. The PCA shall ascertain that any new element in the car wash facility not illustrated on the approved plans such as columns, garage doors, fire safety measures and the like do not compromise appropriate manoeuvring and that compliance is maintained with AS 2890.1, AS 2890.2 and AS 2890.6. Details are to be illustrated on plans submitted with the construction certificate application.

Reason: To ensure appropriate vehicular manoeuvring is provided.

TB0003 #Parking Provision

23. Car wash bays and vacuum bays are to be provided in accordance with the approved plans and with AS 2890.1, AS 2890.2 and AS 2890.6. A total of 9 bays is to be provided and be allocated as follows:

- a) 3 self-serve car wash bays;
- b) 2 automatic car wash bays;
- c) 4 vacuum bays;

Details are to be illustrated on plans submitted with the construction certificate application.

Reason: To comply with Council's parking requirements and Australian Standards.

LB0003 #Tree Retention

24. Prior to the issue of the Construction Certificate, the Certifying Authority must be satisfied the footings of the proposed **Plant Room** will be designed so as not to impact on the trees required to be retained. In order to reduce the impact on the root structure, isolated piers or pier and beam construction is to be used within the following radius of the nominated tree(s):

Tree No.	Name	Common Name	Radius from the trunk
15	<i>Eucalyptus saligna</i>	Sydney Blue Gum	12 metres

Plans submitted with the Construction Certificate application must reflect the above requirements.

Reason: To ensure adequate protection of existing trees.

LB0004 #Landscaping Plan

25. The final Landscape Plan must be consistent with plan numbered Revision B, dated 22 September 2020, prepared by Taylor Brammer together with any additional criteria required by the Development Consent to the satisfaction of the Certifying Authority addressing the following requirements:

- (a) Retention of trees numbered.
- (b) Screening between properties and along rear boundaries to provide privacy and amenity is required to be provided in a minimum 200mm containers. Tree replenishment to both front and rear landscape areas is required. Trees are to be provided in a minimum 45 litre container, must be able to reach a minimum mature height of five (5) metres, and planted with a minimum setback of 3.5m to the outside enclosing wall or edge of a legally constructed building, structure or the proposed development. It is recommended that the location of proposed canopy trees also takes into consideration appropriate distances from boundaries and proposed stormwater infrastructure.
- (c) A proposed plant schedule indicating planting locations, species type (botanic/ common name) mature dimensions, plant numbers and the size of the containers at planting.
- (d) The location of all proposed and existing overhead and underground service lines. The location of such service lines shall be clear of the dripline of existing and proposed trees.
- (e) Any proposed hard surface under the canopy of existing trees shall be permeable and must be laid such that the finished surface levels match the existing level. Permeable paving is to be installed in accordance with the manufacturer's recommendations.
- (f) All landscape plans are to be prepared by a professionally qualified Landscape Architect or Landscape Designer.

Reason: To ensure restoration of environmental amenity.

LB0006 #Statement on specific tree protection

26. A Methodology Statement, prepared by a suitably qualified consulting arborist (Australian Qualification Framework Level 5), must accompany the application for a Construction Certificate. This statement is to identify the measures to be implemented for protection of tree numbered 15 during construction and the expected future health of the trees. The statement is to be structured so that each of the following stages of

construction are individually addressed and supervised by the project arborist:

- (a) Tree Protection Measures inclusive of canopy, trunk and tree root protection in accordance with AS 4970-2009 - Protection of Trees on Development Sites;
- (b) Supervision of any excavation to be undertaken within the calculated Tree Protection Zones of the above nominated trees and/or within three (3) metres of any other existing tree equal to or greater than five (5) metres in height located on any adjoining property.
- (c) Construction of any structure which requires a footing;
- (d) Installation of services (i.e. bridging of roots) and Back filling;
- (e) Landscaping
- (f) Any other stages that the project arborist deems necessary;

Reason: To ensure adequate protection of existing trees.

DB0001 Stormwater Disposal

27. All roof water and surface water is to be connected to an operable drainage system. Details are to be shown on the plans and documentation accompanying the application for a Construction Certificate.

Reason: To ensure satisfactory stormwater disposal.

ECBNSC Non-standard – prior to the issue of a CC

28. All garden beds onsite are to be elevated and self-contained. Updated plans are to be provided to Council's Environmental Health – Contamination team prior to the release of a Construction Certificate.

Reason: To prevent exposure of contaminated soils.

DB0002 Retaining walls

29. If no retaining walls are marked on the approved plans no approval is granted as part of this approval for the construction of any retaining wall that is greater than 600mm in height or within 900mm of any property boundary.

The provision of retaining walls along common boundary lines shall not impact on neighbouring properties. If impact upon neighbouring properties (including fences) is anticipated, then written approval from the affected neighbour shall be obtained and submitted to the certifying authority prior commencement of the works.

Structural details, certified by a practicing structural engineer, shall accompany the application for a Construction Certificate for assessment and approval by the certifying authority.

Reason: To minimise impact on adjoining properties.

DB0003 Sydney Water Quick check

30. A building plan approval must be obtained from Sydney Water Tap in™ to ensure that the approved development will not impact Sydney Water infrastructure.

A copy of the building plan approval receipt from Sydney Water Tap in™ must be submitted to the Principal Certifying Authority upon request prior to works commencing.

Please refer to the website <http://www.sydneywater.com.au/tapin/index.htm>, Sydney Water Tap in™, or telephone 13 20 92.

Reason: To ensure the requirements of Sydney Water have been complied with.

DB0004 Dial Before you Dig Service

31. Prior to any excavation on or near the subject site the person/s having benefit of this consent are required to contact the NSW Dial Before You Dig Service (NDBYD) on 1100 to receive written confirmation from NDBYD that the proposed excavation will not conflict with any underground utility services. The person/s having the benefit of this consent are required to forward the written confirmation from NDBYD to their Principal Certifying Authority (PCA) prior to any excavation occurring.

Reason: To ensure Council's assets are not damaged.

DB0008 Certification of existing drainage system

32. A registered plumber is to certify the condition and functionality of the existing stormwater system and that it is capable of carrying the additional stormwater from the proposed development as outlined in AS 3500.3 – Stormwater Drainage - 2003.

Reason: To ensure satisfactory storm water disposal.

DB0009 Collect&discharge of dirty water from car wash bay

33. All washing of motor vehicles must be carried out in a designated area and must be drained to a sump and cleansed via a coalescing plate separator prior to discharge into the sewer. Documentary evidence is required from the Trade Waste Section of the Sydney Water Corporation Ltd confirming satisfactory arrangements have been made with the Corporation with respect to the disposal of dirty water into the sewerage system, prior to the issue of the Construction Certificate.

Reason: To ensure satisfactory storm water disposal.

DB0012 #On Site Detention

34. Full engineering construction details of the stormwater system, including OSD structures, pipe networks and calculations as per following points, shall be submitted for the approval of the PCA prior to release of the Construction Certificate for any work on the site.

- (a) The stormwater drainage detail design shall be prepared by a Registered Stormwater Design Engineer and shall be generally in accordance with the following Stormwater Plans approved by this consent and with Council's Stormwater Disposal Policy, Council's Design and Development Guidelines, The Upper Parramatta River Catchment Trust On Site Detention Hand book Fourth Edition, the relevant Australian Standards and the National Construction Code.
- (i) **"Stormwater Management Plan", Drawing No 20506_DA_C250, Issue 1**, dated 09/09/2020, prepared by Henry & Hymas.
 - (ii) **"Stormwater Management Plan", Drawing No 20506_DA_C000, 20506_DA_C200 , Issue 2**, dated 09/09/2020, prepared by Henry & Hymas.
 - (iii) **"Stormwater Management Plan", Drawing No 20506_DA_C000, 20506_DA_C100, 20506_DA_C201**, prepared by Henry & Hymas, **subject to approval of OSD storage tank configuration revision.**
- (b) The Site Reference Discharge (Lower Storage), SRDL of 40 L/s/ha, Site Storage Requirement (Lower Storage) SSRL of 284 m3/ha, Site Reference Discharge (Upper Storage), SRDU of 150 l/s/ha, Site Storage Requirement (Total) SSRT of 438 m3/ha (when using the Extended/Flood detention method - 4th edition of UPRCT's handbook).
- (c) Adequate grate(s) to be provided so the OSD tank storage area can be inspected from outside for silt and debris, and to ensure adequate cross ventilation within the tank.
- (d) Certificate from registered structural engineer certifying the structural adequacy of the OSD tank structure.
- Reason:** To minimise the quantity of storm water run-off from the site, surcharge from the existing drainage system and to manage downstream flooding.

DB0013 #Water treatment for stormwater

35. 690 Ocean Protect PSORB Filter Media water quality treatment devices must be installed to manage surface runoff water to Quarry Road to satisfy section 3.3.6.1 of Parramatta City Council Development Control Plan 2011. Details of the proposed devices and their location must accompany the application for a Construction Certificate to the satisfaction of the Certifying Authority.
- Reason:** To ensure appropriate water quality treatment measures are in place.

DBNSC Non-standard - Prior to the issue of a CC

36. Prior to the issue of a Construction Certificate, the Certifying Authority shall send a copy of revised OSD Details and Sections to the Manager of Council's Development Engineers for approval concerning the following items:
- Storm Filter (SF) Chamber shall flow into an Overflow Chamber.
 - SF Chamber shall have a weir wall for discharging into a High Early Discharge (HED) Chamber
 - HED Chamber shall discharge into Overflow Chamber via Orifices sized to the 100 year and 1.5 year storm events.
 - OSD Details and Sections shall meet the requirements of Council's Technical Design Guide

Reason: To minimise the quantity of storm water run-off from the site, surcharge from the existing drainage system and to manage downstream flooding.

DBNSC Non-standard - Prior to the issue of a CC

37. Prior to the issue of a Construction Certificate, the Certifying Authority shall be satisfied that the bund running along the eastern boundary of the site shall be revised as a swale that:
- Calculations demonstrating that the swale has capacity to cater for all external flows entering the site as a result of all storm events up to and including the 1% AEP storm event.
 - The proposed swale shall be designed using the minor/major system design principles noted in Australian Rainfall and Runoff 1987
 - Flows generated by the local upstream catchment can be quantified using Rational Method or DRAINS,
 - Floatable material (bark or timber mulch) shall not form part of the swale

Reason: To minimise impacts on adjoining properties.

PBNSC Non-standard - Prior to the issue of a CC

38. The following measures are to be implemented prior to the issue of a Construction Certificate.
- Plant room walls, floor and roof/ceiling acoustically detailed to provide a noise reduction of not less than 35dBA. All interfaces between walls/floor/ceiling acoustically detailed to control flanking noise.
 - The access door to the north façade of the plant room installed with acoustic rated seals and selected to provide a noise reduction of not less than 35dBA.
 - Heavy duty roller door in the southern façade of the plant room detailed at the sides and head to control breakout noise.
 - Plant installed in the plant room installed on anti-vibration mounts selected to provide not less than 80% vibration isolation.

- All pipes servicing the plant room equipment acoustically isolated from the plant and the plant room floor and walls.
- The carwash plant room floor slab laid on infill or acoustically detailed to enclose opening between ground level and underside of slab.
- Operating hours of the automatic car wash/dryer bays restricted to between 7.00am and 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.
- Operating hours of the self-serve wash bays 2 and 3 restricted to between 7.00am and 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.
- Operating hours of vacuum bays 3 and 4 restricted to between 7.00am and 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.
- The existing vacuum plant replaced WashTec Australia Pty Ltd, Dual Vacuum (with insulation) acoustically rated at 56dBA at one (1) metre or equivalent.
- The existing plant room air compressor replaced with a Pilotair K17si acoustically rated at 63dBA at one (1) metre or equivalent.
- Final details of plant selections and operating hours to be reviewed and assessed by Council's Environmental Health – Acoustics team prior to the release of a Construction Certificate.
- The car wash exit door specified with not less than 3mm thick PVC and detailed to ensure that the bottom of the door in the closed position controls breakout noise.
- The operation sequence of the car wash exit door controlled to ensure it is closed prior to the wash cycle and remains closed during the wash and drying cycles.
- The car wash glass panels specified with not less than 12mm thick toughened glass.
- The car wash and plant room walls not less 100mm precast concrete or equivalent;
- The car wash roof/ceiling detailed with or equivalent to 0.48 BMT Klip-Lok roof decking laid over glasswool insulation, ceiling cavity not less than 150mm and a suspended 4.2 BMT Stramit Monopanel with 70mm (R2.0) Sound Screen cavity insulation, All interfaces between walls/roof/ceiling acoustically detailed to control flanking noise.
- A 3m high (above finished concrete driveway kerb level) acoustic rated wall constructed on the northern side of the vacuum bays, extending to the west adjacent to the car wash exit driveway.

- A 3m high (above finished concrete kerb level) acoustic rated wall constructed on the eastern side of the existing service yard extending to the northern facades of the existing convenience store.
- A 4m high (above finished concrete kerb level) acoustic rated wall constructed on the eastern side of the vacuum bays and extending to the northern faced of the car wash plant room.
- A 4m high (above finished concrete kerb level) acoustic rated wall constructed on the southern side of the car wash plant room extending to the eastern site boundary.
- Final details of acoustic rated walls to be reviewed and assessed by Council's Environmental Health – Acoustics team prior to the release of a Construction Certificate.
- The existing timber screens/fences along the northern side of the site to be retained.
- Driveway speed calming devices and stormwater grates selected and installed to eliminate vehicle drive over impact noise.

Reason: To ensure that the recommendations of the Acoustics Report prepared by Atkins Acoustics dated September 2020 are carried out.

PART C – BEFORE THE COMMENCEMENT OF BUILDING WORK

PC0001 #Appointment of PCA

39. Prior to commencement of work, the person having the benefit of the Development Consent and Construction Certificate approval must:

- (a) Appoint a Principal Certifying Authority (PCA) and notify Council in writing of the appointment (irrespective of whether Council or an accredited private certifier) within 7 days; and
- (b) Notify Council in writing a minimum of 48 hours prior to work commencing of the intended date of commencement.

The Principal Certifying Authority must determine and advise the person having the benefit of the Construction Certificate when inspections, certification and compliance certificates are required.

Reason: To comply with legislative requirements.

PC0002 Enclosure of the site

40. The site must be enclosed by a 1.8m high security fence erected wholly within the confines of the site to prevent unauthorised access. The fence must be installed to the satisfaction of the Principal Certifying Authority prior to the commencement of any work on site.

Reason: To ensure public safety.

PC0003 Site Sign

41. A sign must be erected in a prominent position on any site involving excavation, erection or demolition of a building in accordance with Clause 98 A (2) of the Environmental Planning and Assessment Regulations 2000 detailing:
- (a) Unauthorised entry of the work site is prohibited;
 - (b) The name of the principal contractor (or person in charge of the work site), their telephone number enabling 24hour contact; and
 - (c) The name, address and telephone number of the Principal Certifying Authority;
 - (d) The development consent approved construction hours;
 - (e) The sign must be maintained during excavation, demolition and building work, and removed when the work has been completed.
 - (f) This condition does not apply where works are being carried out inside an existing building.

Reason: Statutory requirement.

BC0001 Toilet facilities on site

42. Prior to work commencing, adequate toilet facilities are to be provided on the work site.

Reason: To ensure adequate toilet facilities are provided.

PC0005 Public liability insurance

43. Public risk insurance in the amount of not less than \$20 million or such other amount as Council may require by notice) must be obtained and furnished to Council before any works authorised by this consent are conducted:

- (a) Above;
- (b) Below; or
- (c) On

Any public land owned or controlled by Council. The public risk insurance must be maintained for the period during which these works are being undertaken.

The public risk insurance must be satisfactory to Council and list Council as an insured and/or interested party.

A copy of the insurance policy obtained must be forwarded to Council before any of the works commence.

Note: Applications for hoarding permits, vehicular crossing etc. will require evidence of insurance upon lodgement of the application.

Reason: To ensure the community is protected from the cost of any claim for damages arising from works authorised by this consent conducted above, below or on any public land owned or controlled by Council.

LC0002 #Tree protection as per arborist report

44. The trees identified for protection within the consent shall be protected prior to and during the demolition/construction process in accordance with the Arboricultural Impact Assessment and Tree Protection Plan prepared by Bluegum Tree Care and Consulting dated September 2020 and the conditions of consent.

Reason: To ensure the protection of the tree(s) to be retained on the site.

LC0006 Pruning/works on tree(s)

45. Consent from Council must be obtained prior to any pruning works being undertaken on any tree on site, or any trees located in adjoining properties.

All approved pruning works must be supervised by an Australian Qualifications Framework (AQF) Level 3 certified Arborist. This includes the pruning of any roots that are 30mm in diameter or larger.

Reason: To ensure the protection of the tree(s) to be retained.

LC0007 Tree Protection During Construction

46. Tree protection measures are to be installed and maintained, under the supervision of an Australian Qualification Framework (AQF) Level 5 Arborist in accordance with AS4970 - Protection of Trees on Development Sites.

Reason: To ensure trees are protected during construction.

DC0001 Construction and Traffic Management Plan

47. Prior to the commencement of any works on site, the applicant must submit a Construction and Traffic Management Plan to the satisfaction of the Principle Certifying Authority. The following matters must be specifically addressed in the Plan:

- (a) Construction Management Plan for the Site. A plan view of the entire site and frontage roadways indicating:
 - (i) Dedicated construction site entrances and exits, controlled by a certified traffic controller, to safely manage pedestrians and construction related vehicles in the frontage roadways,
 - (ii) Turning areas within the site for construction and spoil removal vehicles, allowing a forward entry and egress for all construction vehicles on the site,
 - (iii) The locations of proposed Work Zones in the egress frontage roadways,
 - (iv) Location of any proposed crane standing areas,
 - (v) A dedicated unloading and loading point within the site for all construction vehicles, plant and deliveries,

- (vi) Material, plant and spoil bin storage areas within the site, where all materials are to be dropped off and collected,
 - (vii) The provisions of an on-site parking area for employees, tradesperson and construction vehicles as far as possible.
 - (viii) A detailed description and route map of the proposed route for vehicles involved in spoil removal, material delivery and machine floatage and a copy of this route is to be made available to all contractors.
 - (ix) A detailed description of locations that will be used for layover for trucks waiting to access the construction site.
- (b) Written concurrence from Council's Traffic and Transport Services in relation to installation of a proposed 'Works Zone' restriction in the egress frontage roadways of the development site.

Application fees and kerbside charges for 6 months (minimum) are to be paid in advance in accordance with the Council's Fees and Charges. The 'Works Zone' restriction is to be installed by Council once the applicant notifies Council in writing of the commencement date (subject to approval through Parramatta Traffic Committee processes). Unused fees for kerbside charges are to be refunded once a written request to remove the restriction is received by Council.

- (c) Traffic Control Plan(s) for the site:
- (i) All traffic control devices installed in the road reserve shall be in accordance with the NSW Transport Roads and Maritime Services publication 'Traffic Control Worksite Manual' and be designed by a person licensed to do so (minimum RMS 'red card' qualification) The main stages of the development requiring specific construction management measures are to be identified and specific traffic control measures identified for each,
 - (ii) Approval shall be obtained from City of Parramatta Council for any temporary road closures or crane use from public property.
- (d) Where applicable, the plan must address the following:
- (i) Evidence of Roads and Maritime Services concurrence where construction access is provided directly or within 20 m of an Arterial Road,
 - (ii) A schedule of site inductions shall be held on regular occasions and as determined necessary to ensure all new

employees are aware of the construction management obligations.

- (iii) Minimising construction related traffic movements during school peak periods.

The Construction and Traffic Management Plan shall be prepared by a suitably qualified and experienced traffic consultant and be certified by this person as being in accordance with the requirements of the abovementioned documents and the requirements of this condition.

Reason: To ensure that appropriate measures have been considered during all phases of the construction process in a manner that maintains the environmental amenity and ensures the ongoing safety and protection of people.

DC0002 Road Opening Permits - DA's involving drainage wrk

- 48. The applicant must apply for a road-opening permit where a new pipeline is proposed to be constructed within or across Council owned land. Additional road opening permits and fees may be necessary where connections to public utilities are required (e.g. telephone, electricity, sewer, water or gas).

In addition, no drainage work can be carried out within the Council owned land without this permit being issued. A copy is required to be kept on site.

Reason: To protect Council's assets throughout the development process.

DC0003 Dilapidation survey & report for private properties

- 49. Prior to the commencement of any excavation works on site, the applicant must submit for approval by the Principal Certifying Authority (with an electronic copy forwarded to Council at council@cityofparramatta.nsw.gov.au) a dilapidation report on the visible and structural condition of all neighbouring structures within the 'zone of influence' of the excavation face to a depth of twice that of the excavation.

The report must include a photographic survey of the adjoining properties detailing their physical condition, both internally and externally, including such items as walls, ceilings, roof, structural members and other similar items. The report must be completed by a consulting structural/geotechnical engineer in accordance with the recommendation of the geotechnical report.

In the event access to adjoining allotments for the completion of a dilapidation survey is denied, the applicant must demonstrate in writing that all reasonable steps have been taken to advise the adjoining allotment owners of the benefit of this survey and details of failure to gain consent for access to the satisfaction of the Principle Certifying Authority.

Note: This documentation is for record keeping purposes only, and can be made available to an applicant or affected property owner should it be requested to resolve any dispute over damage to adjoining properties arising from works. It is in the applicant's and adjoining owner's interest for it to be as detailed as possible.

Reason: Management of records.

DC0006 Erosion and Sediment Control measures

50. Erosion and sediment control measures are to be installed in accordance with the publication 'Urban Stormwater: Soils and Construction "The Blue Book" 2004 (4th edition) prior to the commencement of any demolition, excavation or construction works upon the site. These measures are to be maintained throughout the entire works.

Reason: To ensure soil and water management controls are in place before site works commence.

DC0007 Site Maintenance

51. Prior to commencement of works and during construction works, the development site and any road verge immediately in front of the site must be maintained in a safe and tidy manner. In this regard the following must be undertaken:

- (a) all existing buildings are to be secured and maintained to prevent unauthorised access and vandalism
- (b) all site boundaries are to be secured and maintained to prevent unauthorised access to the site;
- (c) all general refuse and/or litter (inclusive of any uncollected mail/advertising material) is to be removed from the site on a fortnightly basis;
- (d) the site is to be maintained clear of weeds; and
- (e) all grassed areas are to be mowed on a monthly basis.

Reason: To ensure public safety and maintenance of the amenity of the surrounding environment.

DC0009 Special Permits

52. Unless otherwise specifically approved in writing by Council, all works, processes, storage of materials, loading and unloading associated with the development are to occur entirely within the property boundaries. The applicant, owner or builder must apply for specific permits if the following activities are required seeking approval pursuant to Section 138 of the Roads Act 1993:

- (a) On-street mobile plant:
E.g. Cranes, concrete pumps, cherry-pickers, etc. - restrictions apply to the hours of operation and the area where the operation will occur, etc. Separate permits are required for each occasion and each piece of equipment. It is the applicant's, owner's and builder's responsibilities to take whatever steps are necessary to ensure the

use of any equipment does not violate adjoining property owner's rights.

- (b) Storage of building materials and building waste containers (skips) on Council's property.
- (c) Permits to utilise Council property for the storage of building materials and building waste containers (skips) are required for each location they are to be stored. Failure to obtain the relevant permits will result in the building materials or building waste containers (skips) being impounded. Storage of building materials and waste containers within Council's open space areas, reserves and parks is prohibited.
- (d) Kerbside restrictions - construction zones:
The applicant's attention is drawn to the possible existing kerbside restrictions adjacent to the development. Should the applicant require alteration of existing kerbside restrictions, or the provision of a work zones, the appropriate application must be made to Council and the fee paid. Applicants should note that the alternatives of such restrictions may require referral to Council's Traffic Committee. An earlier application is suggested to avoid delays in construction programs..

The application is to be lodged with Council's Customer Service Centre.

Reason: Proper management of public land.

PART D – WHILE BUILDING WORK IS BEING CARRIED OUT

PD0001 Copy of development consent

53. A copy of this development consent together with the stamped plans, referenced documents and associated specifications is to be held on-site during the course of any works to be referred to by all contractors to ensure compliance with the approval and the associated conditions of consent.

Reason: To ensure compliance with this consent.

PD0003 Dust Control

54. Dust control measures shall be implemented during all periods of earth works, demolition, excavation and construction to minimise the dust nuisance on surrounding properties. In this regard, dust minimisation practices must be carried out in accordance with Section 126 of the Protection of the Environment Operations Act 1997.

Reason: To protect the amenity of the area.

PD0004 Materials on footpath

55. No building materials skip bins, concrete pumps, cranes, machinery, temporary traffic control, signs or vehicles associated with the construction, excavation or demolition shall be stored or placed on/in Council's footpath, nature strip, roadway, park or reserve without the prior

approval being issued by Council under section 138 of the Roads Act 1993.

Reason: To ensure pedestrian access.

PD0006 Hours of work and noise (DPIE Mandatory Condition)

56. The principal certifier must ensure that building work, demolition or vegetation removal is only carried out between:

- 7am to 5pm on Monday to Friday
- 8am to 5pm on Saturday

The principal certifier must ensure building work, demolition or vegetation removal is not carried out on Sundays and public holidays, except where there is an emergency.

Unless otherwise approved within a construction site management plan, construction vehicles, machinery, goods or materials must not be delivered to the site outside the approved hours of site works.

Note: Any variation to the hours of work requires Council's approval. Any variation to the hours of work requires Council's approval.

Council may permit an extension to the approved hours of work in extenuating or unforeseen circumstances subject to an application and approval by City of Parramatta Council (CoPC) in accordance with the 'After Hours Works for Approved Development Applications Policy' (Policy).

A copy of this Policy and associated application form is available on the CoPC website. A fee will apply to any application made in accordance with this Policy.

The matters of consideration of any extension sought would include, but not be limited to the following aspects and should be detailed in any application made:

- Nature of work to be conducted;
- Reason for after-hours completion;
- Residual effect of work (noise, traffic, parking);
- Demographic of area (residential, industrial);
- Compliance history of subject premises;
- Current hours of operation;
- Mitigating or extenuating circumstance; and
- Impact of works not being completed.

Reason: To protect the amenity of the surrounding area.

PD0007 Complaints register

57. The applicant must record details of all complaints received during the construction period in an up to date complaints register. The register must record, but not necessarily be limited to:
- (a) The date and time of the complaint;
 - (b) The means by which the complaint was made;
 - (c) Any personal details of the complainants that were provided, or if no details were provided, a note to that effect;
 - (d) Nature of the complaints;
 - (e) Any action(s) taken by the applicant in relation to the complaint, including any follow up contact with the complainant; and
 - (f) If no action was taken by the applicant in relation to the complaint, the reason(s) why no action was taken.

The complaints register must be made available to Council and/or the Principal Certifying Authority upon request.

Reason: To allow the Principal Certifying Authority/Council to respond to concerns raised by the public.

Reason: To minimise the impact on the amenity of the area.

PD0008 Construction Noise (DPIE Mandatory Cond)

58. While building work is being carried out, and where a noise and vibration management plan is approved under this consent, the applicant must ensure that any noise generated from the site is controlled in accordance with the requirements of that plan.

OR

While building work is being carried out and where no noise and vibration management plan is approved under this consent, the applicant is to ensure that any noise caused by demolition, vegetation removal or construction does not exceed an LAeq (15 min) of 5dB(A) above background noise, when measured at any lot boundary of the property where the construction is being carried out.

Reason: To protect the amenity of the neighbourhood.

PD0010 Survey Report

59. While building work is being carried out, a registered surveyor is to measure and mark the positions of the following and provide them to the principal certifier: -
- (a) All footings/ foundations
 - (b) At other stages of construction – any marks that are required by the principal certifier

Reason: To ensure buildings are sited and positioned in the approved location.

TD0001 Road Occupancy Permit

60. Occupation of any part of the footpath or road at or above (carrying out work, storage of building materials and the like) during construction of the development shall require a Road Occupancy Permit from Council. The

applicant is to be required to submit an application for a Road Occupancy Permit through Council's Traffic and Transport Services, prior to carrying out the construction/restoration works.

Reason: To ensure proper management of Council assets.

TD0002 Oversize vehicles using local roads

61. Oversize vehicles using local roads require approval from the National Heavy Vehicle Regulator (NHVR). The applicant is required to submit an application for an Oversize Vehicle Access Permit through NHVR's portal (www.nhvr.gov.au/about-us/nhvr-portal) prior to driving through local roads within the City of Parramatta LGA.

Reason: To ensure maintenance of Council's assets.

LD0004 Material storage and trees

62. No materials (including waste and soil), equipment, structures or goods of any type are to be stored, kept or placed within 5m of the trunk of a tree or within the drip line of any tree.

Reason: To ensure the protection of the tree(s) to be retained on the site.

LD0006 #Excavation to be supervised by arborist

63. All work within 12 m of *Eucalyptus saligna* (Sydney Blue Gum), located on the adjoining property and numbered Tree 15, is to be supervised by an Australian Qualifications Framework (AQF) Level 3 arborist. If during excavation the Arborist identifies remedial work is necessary, it is to be supervised by this Arborist.

Once the work is completed a written report detailing the remedial work undertaken is to be forwarded to the Principal Certifying Authority.

Reason: To provided adequate protection of trees.

LD0007 #Excavation in the vicinity of trees

64. No mechanical excavation is to occur within the distance specified below:

Tree No.	Species	Common Name	Location	Distance from trunk
15	<i>Eucalyptus saligna</i>	Sydney Blue Gum	Adjoining property	12 metres

Reason: To ensure the protection of tree(s).

LD0008 No attachments to trees

65. No service, structure, conduit or the like is permitted to be fixed or attached to any tree.

Reason: To ensure the protection of the tree(s).

LD0009 Planting Requirements

66. All trees planted as required by the approved landscape plan are to be a minimum 45 litre container size. All shrubs planted as part of the approved landscape plan are to have a minimum 200mm container size.

Reason: To ensure appropriate landscaping.

LD0011 Tree Removal

67. Trees to be removed are:

Tree No.	Species	Common Name	Location
6	<i>Photinia robusta</i>	Photinia	Front setback
7	<i>Photinia robusta</i>	Photinia	Front setback
8	<i>Photinia robusta</i>	Photinia	Front setback
9	<i>Eucalyptus microcorys</i>	Tallowwood	Rear setback
10	<i>Eucalyptus scoparia</i>	Wallangarra White Gum	Rear setback
11	<i>Eucalyptus sideroxylon</i>	Red Ironbark	Rear setback
16	<i>Eucalyptus saligna</i>	Sydney Blue Gum	Rear setback
17	<i>Eucalyptus microcorys</i>	Tallowwood	Rear setback
18	<i>Eucalyptus microcorys</i>	Tallowwood	Rear setback

Reason: To facilitate development.

LD0013 Removal of trees by an arborist

68. All approved tree removal must be supervised by an Australian Qualification Framework (AQF) Level 3 Arborist and undertaken in accordance with the Code of Practice for Amenity Tree Industry 1998.

Reason: To ensure tree works are carried out safely.

DD0005 Erosion & sediment control measures

69. Works are not to result in sedimentation and or run-off from the approved works onto the adjoining properties and or public lands. The person having the benefit of this consent must ensure sediment is not tracked out from the development site.

Reason: To ensure no adverse impacts on neighbouring properties.

DD0006 Damage to public infrastructure

70. Any damage to Council assets that impacts on public safety during construction is to be rectified immediately to the satisfaction of Council with all costs to be borne by the person having the benefit of the Development Consent.

Reason: To protect public safety.

DD0009 Car parking & driveways

71. Car parking area and internal accessways must be constructed, marked and signposted in accordance with AS2890.1 –2004 'Off Street Car Parking Facilities' prior to an Occupation Certificate being issued.

Reason: To ensure appropriate car parking.

ECD0005 Disposal of Material at Licensed Landfill

72. Any contamination material to be removed from the site shall be disposed of to an EPA licensed landfill.

Reason: To comply with the statutory requirements of the Protection of the Environment Operations Act 1997.

PART E – BEFORE THE ISSUE OF AN OCCUPATION CERTIFICATE

PE0001 Occupation Certificate

73. Occupation or use of the building or part is not permitted until an Occupation Certificate has been issued in accordance with Section 6.9 of the Environmental Planning and Assessment Act 1979.

Reason: To comply with legislative requirements of the Environmental Planning and Assessment Act 1979.

PE0024 The release of bonds

74. A written application to Council's Civil Assets Team for the release of a bond must quote the following:

- (a) Council's Development Application number; and
- (b) Site address.

The bond is refundable only where Council is satisfied the public way has been adequately reinstated, and any necessary remediation/rectification works have been completed.

An Occupation Certificate is not to be issued until correspondence has been issued by Council detailing the bond has been released.

Note: Council's Civil Assets Team will take up to 21 days from receipt of the request to provide the written advice.

Reason: To safe guard the public assets of council and to ensure that these assets are repaired/maintained in a timely manner.

BE0001 Record of inspections carried out

75. In accordance with Clause 162B of the Environmental Planning and Assessment Regulation 2000, the Principal Certifying Authority responsible for the critical stage inspections must make a record of each inspection as soon as practicable after it has been carried out. The record must include:

- (a) The development application and Construction Certificate number as registered;
- (b) The address of the property at which the inspection was carried out;
- (c) The type of inspection;
- (d) The date on which it was carried out;
- (e) The name and accreditation number of the certifying authority by whom the inspection was carried out; and

- (f) Whether or not the inspection was satisfactory in the opinion of the certifying authority who carried it out.

Reason: To comply with statutory requirements.

LE0002 Cert.Auth.Arrange Qualified LandscapeArch.(multi)

76. A qualified Landscape Architect/Designer must certify that the completed works are in accordance with the approved landscape plan. All landscape works must be completed prior to the issue of an Occupation Certificate.

Reason: To ensure restoration of environmental amenity.

DE0003 Work-as-Executed Plan (DPIE Condition)

77. Works-As-Executed stormwater plans are to address the following:

- (a) A WAE survey shall be conducted and plans prepared showing the 'as built' of the complete on-site detention system including (but not limited to) discharge point into Council system, storage tank (including all critical elements), all pipes and pits connected to the OSD system, overland flow swale and surface levels that control surface flows to the OSD system and by design bypassing the OSD system.

The survey shall confirm a) that all retaining walls including foundations are wholly within the site boundary, b) that the swales have been constructed as per the approved plans, c) that the relevant boundary fences have been raised to allow overland flow (surface flows) to drain unobstructed though to the swale/flow path.

- (a) The Work-As-Executed plans are prepared on the copies of the approved drainage plans issued with the Construction Certificate with the variations marked in red ink.
- (b) The Work-As-Executed plans have been prepared by a registered surveyor certifying the accuracy of dimensions, levels, storage volumes, etc.
- (c) The as built On-Site Detention (OSD) storage volumes are to be presented in a tabular form (depth verses volume table
- (d) OSD Works-As-Executed dimensions form (refer to UPRCT Handbook).
- (e) Certificate of Hydraulic Compliance from a qualified drainage / hydraulic engineer (refer to UPRCT Handbook). The certificate must only be provided after conducting a satisfactory final inspection. The final inspection shall include the application of all the ancillary components of the system including but not limited to: step-irons, orifice plate, trash screen with appropriate wall attachment, hinged lockable grates, confined space sign, functioning return lap valve and relief drains within DCP sump etc.

- (f) Certificate of Structural compliance of the OSD tank shall reference the structural elements including floor slab/foundations, walls and cover slab from a qualified structural engineer

The above is to be submitted to the Principal Certifying Authority prior to the issue of an Occupation Certificate and a copy is to accompany the application for an Occupation Certificate when lodged with Council.

Reason: To ensure works comply with approved plans and conditions of consent.

DE0005 #OSD Positive Covenant/Restriction

78. Prior to the issue of an Occupation Certificate a Positive Covenant and Restriction on the Use of Land under Section 88E of the Conveyancing Act 1919 must be created, burdening the owner with the requirement to maintain the on-site stormwater detention facilities on the lot.

The terms of the 88E Instruments are to be generally in accordance with Council's "standard terms" available in Council's website, under Development Forms.

Where a Title exists, the Positive Covenant and Restriction on the Use of Land is to be created through via an application to the NSW Land Registry Services using forms 13PC and 13RPA. Accompanying this form is the requirement for a plan to scale showing the relative location of the On-Site Detention facility, including its relationship to the building footprint.

Registered title documents showing the covenants and restrictions must be submitted to and approved by the Principal Certifying Authority prior to Occupation or use of on-site.

Electronic colour photographs in jpg format of the on-site detention facility shall accompany the application for the Positive Covenant and the Restriction on the Use of the Land. These photos shall include such elements as the orifice plate, trash screen, step irons, weir, sump and bench on the floor of the DCP, return pipe and flap valve, wide angle view of the storage area or multiple photos, grates closed from above, grates open showing the edges to the opening and under frame packing with mortar or concrete, all pipe entries to the DCP and confined space warning signs at each entry point. The photos must be well labelled and must differentiate between multiple tanks. Additional photos may be requested if required.

Reason: To ensure maintenance of on-site detention facilities.

DE0006 Section 73 Certificate

79. A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained prior to the issue of any Occupation Certificate. The application must be made through an authorised Water Servicing Coordinator. Please refer to "Your Business" section of Sydney Water's web site at www.sydneywater.com.au then the "e-developer" icon or telephone 13 20 92.

Reason: To ensure the requirements of Sydney Water have been complied with.

PART F – OCCUPATION AND ONGOING USE

PF0017 Goods not to be displayed outside premises

80. No goods are to be stored/displayed outside the walls of the building.

Reason: To ensure visual amenity.

PF0049 Graffiti Management

81. The owner/manager of the site/business is responsible for the removal of all graffiti from the building/structures/signage and/or fencing within 48 hours of its application.

Reason: To ensure the removal of graffiti.

PF0025 #Operating hours

82. The days and hours of operation for the approved car wash and all associated activities are restricted to:

Day	Time
Monday	7:00am – 10:00pm
Tuesday	7:00am – 10:00pm
Wednesday	7:00am – 10:00pm
Thursday	7:00am – 10:00pm
Friday	7:00am – 10:00pm
Saturday	8:00am – 10:00pm
Sunday	8:00am – 10:00pm
Public Holidays	8:00am – 10:00pm

Note: all infrastructure and tools associated with the approved car wash are to be locked and removed from public access afterhours. All vacuum bays and self-service areas are to be sectioned off to the public after trading hours.

Reason: To minimise the impact on the amenity of the area.

PF0004 External Plant/Air-conditioning noise levels

83. Any external plant/air-conditioning system must not exceed a noise level of 5dBA above the background noise level when measured at the boundaries of the property.

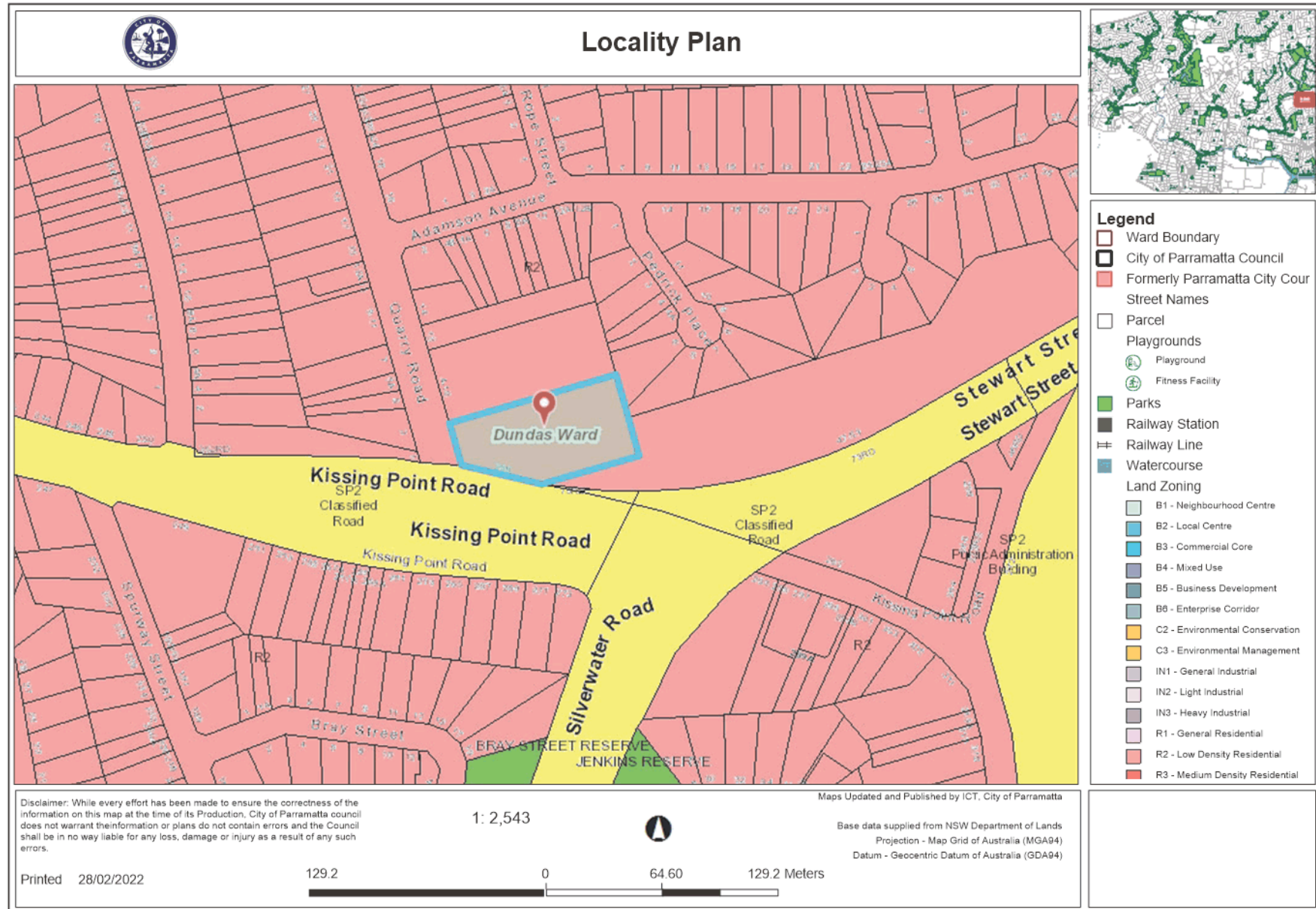
Reason: To minimise noise impact of mechanical equipment.

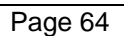
TF0004 #No queuing vehicles outside the site

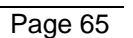
84. The site manager is to ensure that vehicles arriving to the car wash facility can be accommodated within the site and do not queue across the exit driveway onto Kissing Point Road.

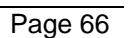
Reason: To ensure maintenance of traffic flow along the road.

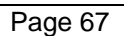
Date: 9 February 2022
Responsible Officer: Matthieu Santoso



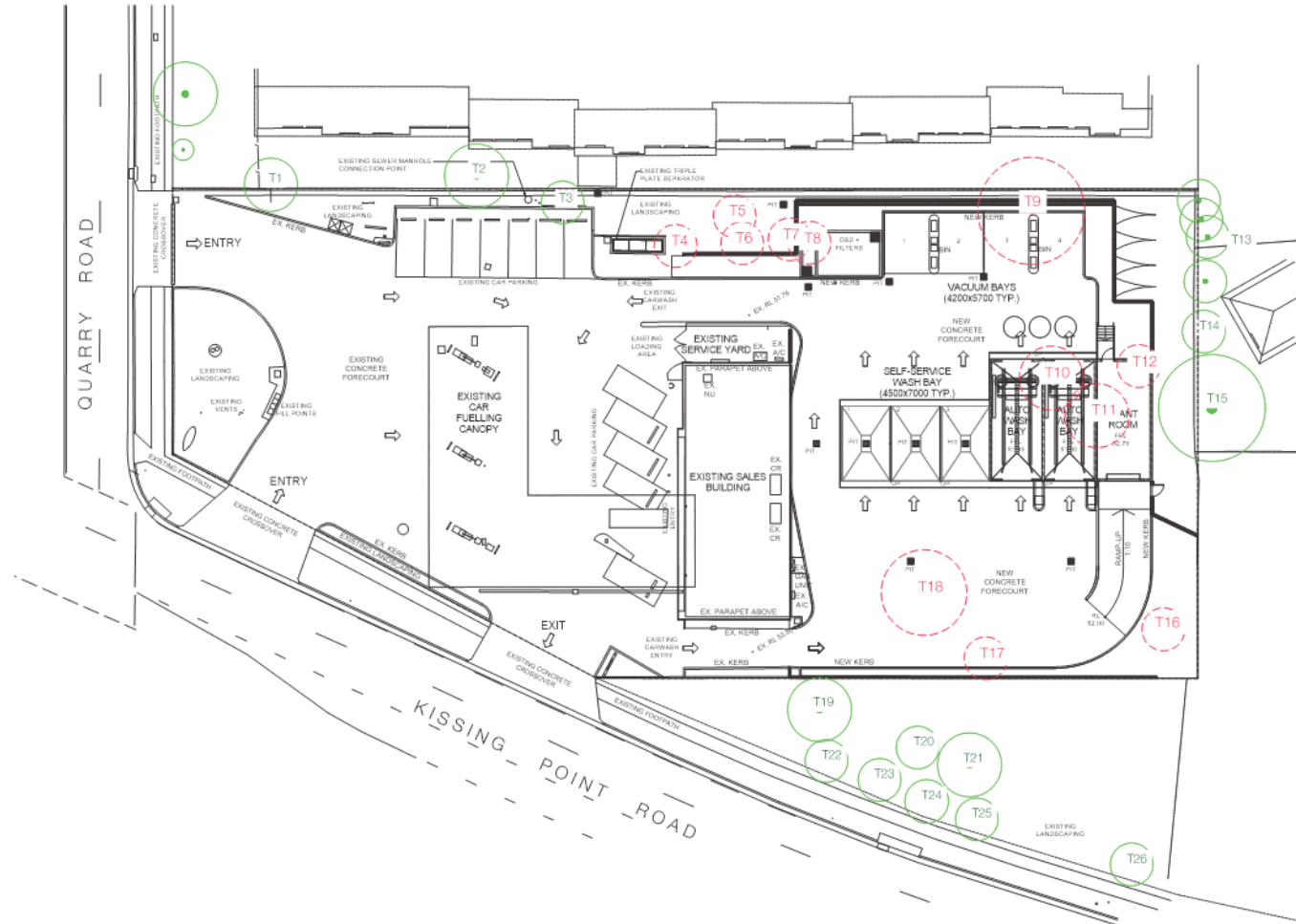








Tree Retention and Removal Plan



EXISTING VEGETATION SCHEDULE

ID	BOTANICAL NAME	COMMON NAME	HEIGHT (m)	RETAIN/REMOVE
T1	<i>Cynodon dactylon</i>	Lemon-scented Gum	13	RETAIN
T2	<i>Cassia ciliar</i>	Orange	10	RETAIN
T3	<i>Leucaena leucocalyx</i>	Leucaena	10	RETAIN
T4	<i>Phorata rubra</i>	Phorata	7	REMOVE
T5	<i>Calliandra viridis</i>	Weeping Boerhaavia	5	REMOVE
T6	<i>Phorata rubra</i>	Phorata	7	REMOVE
T7	<i>Phorata rubra</i>	Phorata	6	REMOVE
T8	<i>Calliandra viridis</i>	Phorata	7	REMOVE
T9	<i>Calliandra viridis</i>	Talwood	19	REMOVE
T10	<i>Escallonia scoparia</i>	Walgamins White Gum	13	REMOVE
T11	<i>Calliandra viridis</i>	Red Ironbark	12	REMOVE
T12	<i>Dead tree</i>			
T13	<i>Leucaena pectoralis</i>	Lemon-scented Tea Tree	6	RETAIN
T14	<i>Calliandra viridis</i>	Weeping Boerhaavia	5	REMOVE
T15	<i>Escallonia saligna</i>	Sydney Blue Gum	27	RETAIN
T16	<i>Escallonia saligna</i>	Sydney Blue Gum	14	REMOVE
T17	<i>Calliandra viridis</i>	Weeping Boerhaavia	5	REMOVE
T18	<i>Escallonia microcarpa</i>	Talwood	13	REMOVE
T19	<i>Cynobale macleodii</i>	Spotted Gum	14	RETAIN
T20	<i>Cynobale macleodii</i>	Spotted Gum	17	RETAIN
T21	<i>Cynobale macleodii</i>	Spotted Gum	17	RETAIN
T22	<i>Cynobale macleodii</i>	Spotted Gum	3	RETAIN
T23	<i>Cynobale macleodii</i>	Spotted Gum	3	RETAIN
T24	<i>Cynobale macleodii</i>	Spotted Gum	3	RETAIN
T25	<i>Cynobale macleodii</i>	Spotted Gum	4	RETAIN
T26	<i>Cynobale macleodii</i>	Spotted Gum	16	RETAIN

NOTES:
Refer to Arboricultural Impact Assessment
by Bluegum Arborist from September 2020.



SCALE 1:200 @ A1

0 2 4 8 12m

A horizontal line with vertical tick marks at 0, 2, 4, 8, and 12 meters. The segments between 0-2, 2-4, and 4-8 are each divided into four smaller equal segments, representing 0.5m increments. The segment between 8-12 is divided into two smaller equal segments, representing 2m increments.SITE BOUNDARY
EXISTING LOT LINES

EXISTING TREE
REMOVED

project: 256 Kissing Point Road, Dundas Valley, NSW 2117
client: Jaeger Petroleum Pty Ltd
date: 22.09.2020
revision: B
drawn: SV
checked: AL

117 TaylorBrammer
TAYLOR BRAMMER LANDSCAPE ARCHITECTS PTY LTD
EXPERIENT STUDIOS
7/8 Delft Street, Melbourne, VIC 3000. info@taylorbrammer.com.au T 03 9397 0000
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LA01

Landscape Plan

- 01 Existing trees retained and protected as per Arboricultural Impact Assessment by Bluegum dated September 2020
- 02 New planting to back of building to screen services providing seasonal interest and mural of low shrubs and groundcovers in irrigated garden bed
- 03 Low feature planting and groundcovers to primary streetfront
- 04 Screen planting to boundaries of site providing amenity and screening fence from view
- 05 Non combustible mulch to vent areas
- 06 New evergreen tree planting
- 07 Existing landscape retained
- 08 600mm planter wall to allow for planting on top of OSD tank



PLANT SCHEDULE

ID	BOTANICAL NAME	COMMON NAME	MATURE HEIGHT	POT SIZE	QTY
TREES					
01-an	Cupressus anacardifolia	Tuckeroo	8m	75L	1
SHRUBS					
He-em	Hebe 'Emerald Green'	Emerald green	1m	200mm	65
Lo-ch	Leucopetalum chinensis var. rubrum 'Burgundy'	Chinese Fringe Flower	1m	200mm	32
Ph-n	Phoradendron 'Red Ruler'	Red robin phoradendron	2m	200mm	48
Ph-la	Phoradendron 'Star Jack'	NZ fox	0.5m	200mm	35
GROUND COVERS					
Di-m	Dioscorea cymosa	Lords Howe wedding lily	0.5m	150mm	51
Gr-la	Grevillea laurifolia	Grevillea laurifolia	-	150mm	70
Co-mb	Convolvulus 'Moroccan Beauty'	Moroccan Beauty	0.2m	150mm	94
Lo-r	Lomandra 'Liner Turf'	Maid Runt	0.5m	150mm	65

NOTES:
Refer to LA01 and Arboricultural Impact Assessment by Bluegum Arborist from September 2020 for existing trees retained.

LEGEND

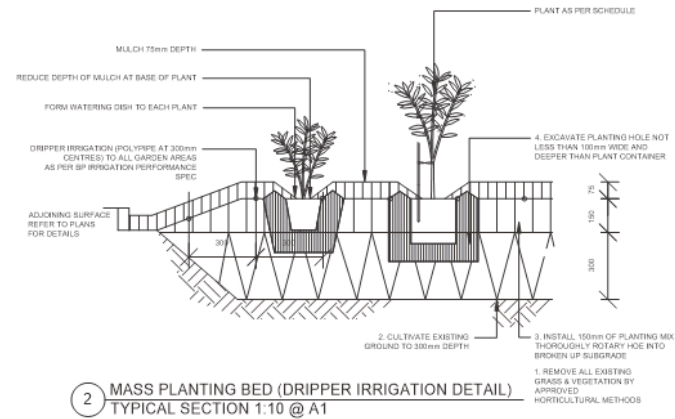
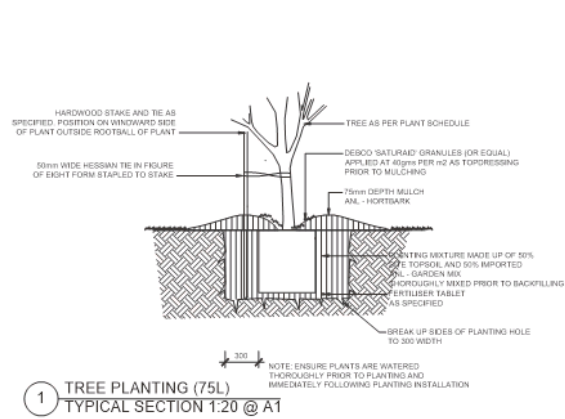


project: 256 Kissing Point Road, Dundas Valley, NSW 2117
 client: Jacobs Petroleum Pty Ltd
 date: 22.09.2020
 revision: B
 drawn: SV
 checked: AL

TaylorBrammer
 TAYLOR BRAMMER LANDSCAPE ARCHITECTS PTY LTD
 210 Kissing Point Road, Dundas Valley, NSW 2117
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LA02

Typical Details



project: 256 Kissing Point Road, Dundas Valley, NSW 2117
client: Jasbe Petroleum Pty Ltd
date: 22.05.2020
revision: B
drawn: SV
checked: AL

TaylorBrammer
TAYLOR BRAMMER LANDSCAPE ARCHITECTS PTY LTD
1/11 DUNDAS VALLEY
2/11 DUNDAS VALLEY
3/11 DUNDAS VALLEY
4/11 DUNDAS VALLEY
5/11 DUNDAS VALLEY
6/11 DUNDAS VALLEY
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9/11 DUNDAS VALLEY
10/11 DUNDAS VALLEY
11/11 DUNDAS VALLEY
12/11 DUNDAS VALLEY

LA03

PROPOSED CARWASH,
256 KISSING POINT ROAD, DUNDAS VALLEY, NSW 2117
CIVIL ENGINEERING WORKS

GENERAL NOTES:

1. ALL WORK TO BE CARRIED OUT IN ACCORDANCE WITH A COPY OF PARIMMUNIA CONSULTA'S SPECIFICATION. CONTRACTOR TO OBTAIN AND RETAIN A CITY OF SHELBY ORDERING THE CLOSURE OF THE HIGHWAY.
2. ALL NEW WORKS ARE TO BE MADE A SMOOTH JUNCTION WITH EXISTING CONDITIONS AND MAINTAIN IN A WORKMANLIKE MANNER.
3. THE CONTRACTOR IS TO VARY THE LOCATION OF ALL SERVICES WITH EACH RELEVANT AUTHORITY. IN ANY DEVIATION TO SERVICES SHALL BE RECTIFIED BY THE CONTRACTOR AT HIS OWN EXPENSE. ANY DAMAGE TO EXISTING UTILITIES OR SERVICES IN EXCESS OF THESE PLANS ARE TO BE NOTED INSTANT AT THE TIME OF SURVEY OR AS DETERMINED BY THE CITY OF SHELBY. CONTRACTOR SHALL BE RESPONSIBLE TO CITY OF SHELBY TO GUARANTEE THE INFORMATION SUBMITTED AND ACCEPT ANY RESPONSIBILITY FOR NEGLIGENCE OR NEGLIGENCE OF CONTRACTOR'S NEGLIGENCE.
4. SERVICES ACCESSIBLE TO THE EXISTING AND PROPERTIES ARE TO BE MAINTAINED IN WORKING ORDER AT ALL TIMES THROUGHOUT CONSTRUCTION.
5. ACQUIT DEEDS SERVICE COVERS TO BE NOT FINISHED-LEVELS TO RELEVANT AUTHORITY REQUIREMENTS IF NECESSARY.
6. REINSTATE AND STABILIZE ALL DISTURBED LANDSCAPED AREAS.
7. MINIMUM GRADING OF SUBSOL SHALL BE 0.5% (1 IN 20) FALL TO OUTLETS.
8. ALL TEMPORARY SEDIMENT AND EROSION CONTROL DEVICES ARE TO BE CONSTRUCTED PLACED AND MAINTAINED IN ACCORDANCE WITH THE TECHNICAL SPECIFICATIONS OF THE CITY OF SHELBY. CONTRACTOR TO OBTAIN A COPY OF PARIMMUNIA CONSULTA'S REQUIREMENTS WARE AVAILABLE.
9. CONTRACTOR TO CHECK AND CONFIRM SITE DRAINAGE CONNECTIONS ACROSS THE HIGHWAY PRIOR TO COMMENCEMENT OF SITE DRAINAGE WORKS.
10. PRIORITIES AFFECTED BY THE WORKS ARE TO BE NOTIFIED IN ADVANCE IN WRITING.

EXISTING SERVICES & FEATURES

- THE CONTRACTOR SHALL ALLOW FOR THE CARPING OFF, EXCAVATION AND REMOVAL, IF REQUIRED, OF ALL EXISTING STRUCTURES AFFECTED BY WORKS WITHIN THE AREA SHOWN ON THE DRAWINGS UNLESS OTHERWISE DIRECTED OTHERWISE BY THE SUPERINTENDENT.
- THE CONTRACTOR SHALL ENSURE THAT ALL TREES SURVIVING THE BUILDING NOT AFFECTED BY THE WORKS ARE NOT DISRUPTED.
- PRIOR TO COMMENCEMENT OF ANY WORKS THE CONTRACTOR SHALL OBTAIN APPROVAL OF THE SUPERINTENDENT FOR THE REMOVAL OF ANY CURB OR TEMPORARY STRUCTURE.
- CONTRACTOR SHALL CONSTRUCT TEMPORARY STRUCTURES TO MAINTAIN SURFACE TO EXISTING BUILDING REMAINING IN OPERATION DURING WORKS TO THE SATISFACTION AND APPROVAL OF THE SUPERINTENDENT. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE COMMENCEMENT, THE CONTRACTOR SHALL REMOVE ALL SUCH TEMPORARY STRUCTURES AND MAKE GOOD TO THE SATISFACTION OF THE SUPERINTENDENT.
- INTERRUPTION TO SUPPLY OF EXISTING STRUCTURES SHALL BE SO AS NOT TO CAUSE INTERFERENCE TO THE OPERATION OF THE BUILDING TO OBTAIN APPROVAL OF THE SUPERINTENDENT FOR THE PERIOD OF INTERRUPTION.
- EXISTING STRUCTURES, BUILDINGS, EXTERNAL STRUCTURES AND TREES SHOWN ON THESE DRAWINGS ARE EXISTING FEATURES NOT TO ANY DIMENSION WORKS.
- EXISTING STRUCTURES UNLESS SHOWN ON SUPPLY PLANS HAVE BEEN INSPECTED FROM THE SURFACE AND ARE NOT TO BE REMOVED OR DISRUPTED UNLESS IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO COMPLETE A CLAM BEFORE YOU DO ANY WORK. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE REMOVAL OF THE SUPERINTENDENT TO THE COMMENCEMENT OF ANY WORK. ANY DISCREPANCIES SHALL BE REPORTED TO THE SUPERINTENDENT IMMEDIATELY. ALL DISCREPANCIES SHALL BE OBTAINED FROM THE RELEVANT SERVICE AUTHORITY.
- ALL BRANDED GAS WATER SERVICES UNDERGROUNDINGS AND BROCK PIPING SHALL BE LOCATED IN A PUBLIC WATER SERVICE CATCHMENT EXTENDING A MINIMUM OF 300mm



LOCALITY SKETCH

DRAWING SCHEDULE

DRAWING CODES	
20390, DA, C003	COVER SHEET, DRAWING SCHEDULE, NOTES AND LOCALITY SKETCH
20390, DA, C103	DETAIL PLAN
20390, DA, C203	STORMWATER MISCELLANEOUS DETAILS AND FIT LID SCHEDULE
20390, DA, C301	OSD DETAILS AND SECTION
20390, DA, C293	STORMWATER CATCHMENT PLAN
20390, DA, S001	SEEDMENT AND EROSION CONTROL PLAN
20390, DA, S010	SEEDMENT AND EROSION CONTROL, DETAILS

SITEWORKS NOTES

- DESIGN AND/ OR
- ORIGIN OF LEVELS. REFER TO BENCH OR STATE SURVEY MARKS WHERE SHOWN ON PLAN.
- CONTRACTOR MUST VERIFY ALL DIMENSIONS AND EXISTING LEVELS ON SITE PRIOR TO THE COMMENCEMENT OF WORK.
- ALL WORKS TO BE UNDERTAKEN IN ACCORDANCE WITH THE DETAILS SHOWN ON THE DRAWINGS & THE DIRECTIONS OF THE SUPERINTENDENT.
- EXISTING SERVICES UNLESS SHOWN ON THE SURVEY PLAN HAVE BEEN PLOTTED BY THE SERVICES ENGINEER. UNLESS THERE ARE SUCH THEIR ACCURACY CANNOT BE GUARANTEED. IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO DETERMINE LOCATION AND LEVEL OF ALL EXISTING SERVICES PRIOR TO THE COMMENCEMENT OF ANY WORK. ANY UNDERTAKING SHALL BE REFERRED TO THE SUPERINTENDENT. CLEARANCES SHALL BE OBTAINED FROM THE RELEVANT SERVICE PROVIDER PRIOR TO ANY UNDERTAKING.
- BEFORE NEW WORKS ARE SHOWN THE CONTRACTOR SHALL ENSURE THAT A SMOOTH EVEN PROFILE, FREE FROM AMPLETS CHANGES IS ACHIEVED.
- THE CONTRACTOR SHALL ARRANGE ALL SURVEY RETOFT TO BE CARRIED OUT BY A REGISTERED SURVEYOR.
- CARE IS TO BE TAKEN WHEN EXCAVATING NEW EXISTING GROUES NO MECHANICAL, ELECTRICAL OR TELECOMMUNICATIONS CABLES OR TELEPHONE OR CABLES TO BE EXCAVATED AT ANY DEPTH AREAS.
- THE CONTRACTOR TO OBTAIN NECESSARY APPROVALS WHERE APPLICABLE.
- MAKE SMOOTH TRANSITION TO EXISTING SURFACES AND MAKE GOOD.
- THESE PLANS SHALL BE READ IN CONJUNCTION WITH APPROVED LANDSCAPE, PLANTING, STRUCTURAL, HYDRAULIC AND MECHANICAL DRAWINGS (AS SPECIFICATIONS)
- OR WRITTEN INSTRUCTIONS THAT MAY BE ISSUED RELATING TO THE DEVELOPMENT OF THE SITE.
- TRINCHES THROUGH EXISTING ROAD AND CONCRETE PAVEMENTS SHALL BE SAWCUT TO FULL DEPTH OF ASPHALT AND A MINIMUM OF 150mm IN BROADENED PAVING.
- ALL BRANCH GAS AND WATER SERVICES UNLESS SHOWN ON DRAWINGS AND BRICK PIPES SHALL BE LOCATED IN BURIED CONCRETE AND CONCRETE CULVERTS EXISTING A MINIMUM OF 300mm DEPTH ABOVE OF PAVING.
- GRASSES TO PLANTMENTS TO BE AS IMPLIED BY PLOTTING ON PLAN. GRAVEE DEPTH WITHIN NOMINATED LRS AREAS EXCAVATED USING ROLDS GRASSER THAN 5mm DEPTH WILL NOT BE ACCEPTED UNLESS A DESIGNATED SAW POINT.
- ALL COVERING AND GRATES ETC TO EXISTING SERVICE (UTILITIES) ARE TO BE LOCATED AS SHOWN BUT NOT FINISHED SURFACES UNLESS OTHERWISE SPECIFIED.

SURVEY NOTES

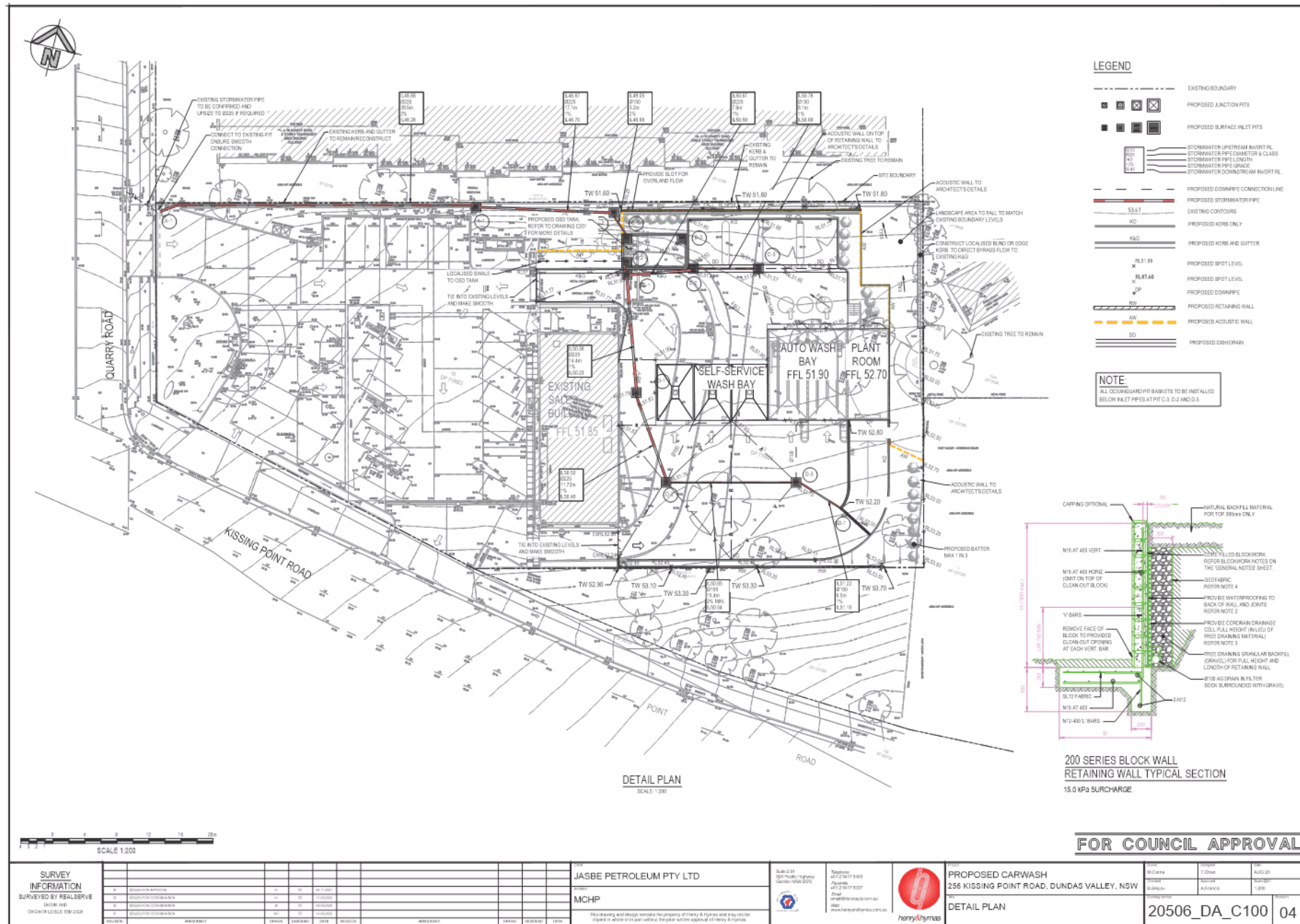
THE EXISTING SITE CONDITIONS SHOWN ON THE FOLLOWING DRAWINGS HAVE BEEN INVESTIGATED BY THE SURVEYOR SPECIFIED IN THE TITLE BLOCK.

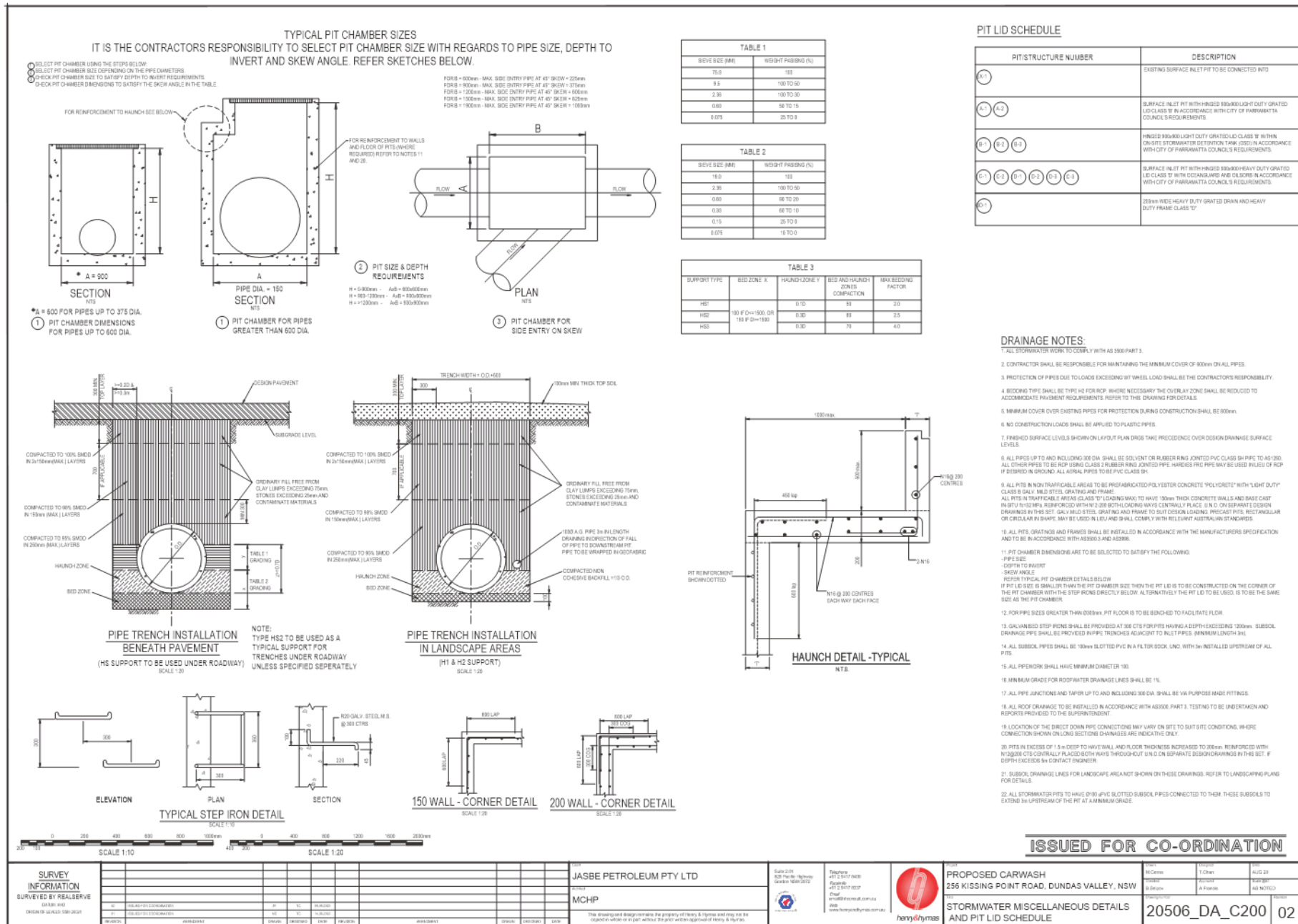
THE INFORMATION IS SHOWN TO PROVIDE A BASIS FOR DESIGN. HENRY AND HYMAS PTY LTD. DOES NOT GUARANTEE THE ACCURACY OR COMPLETENESS OF THE SURVEY BASE OR ITS SUITABILITY AS A BASIS FOR CONSTRUCTION DRAWINGS.

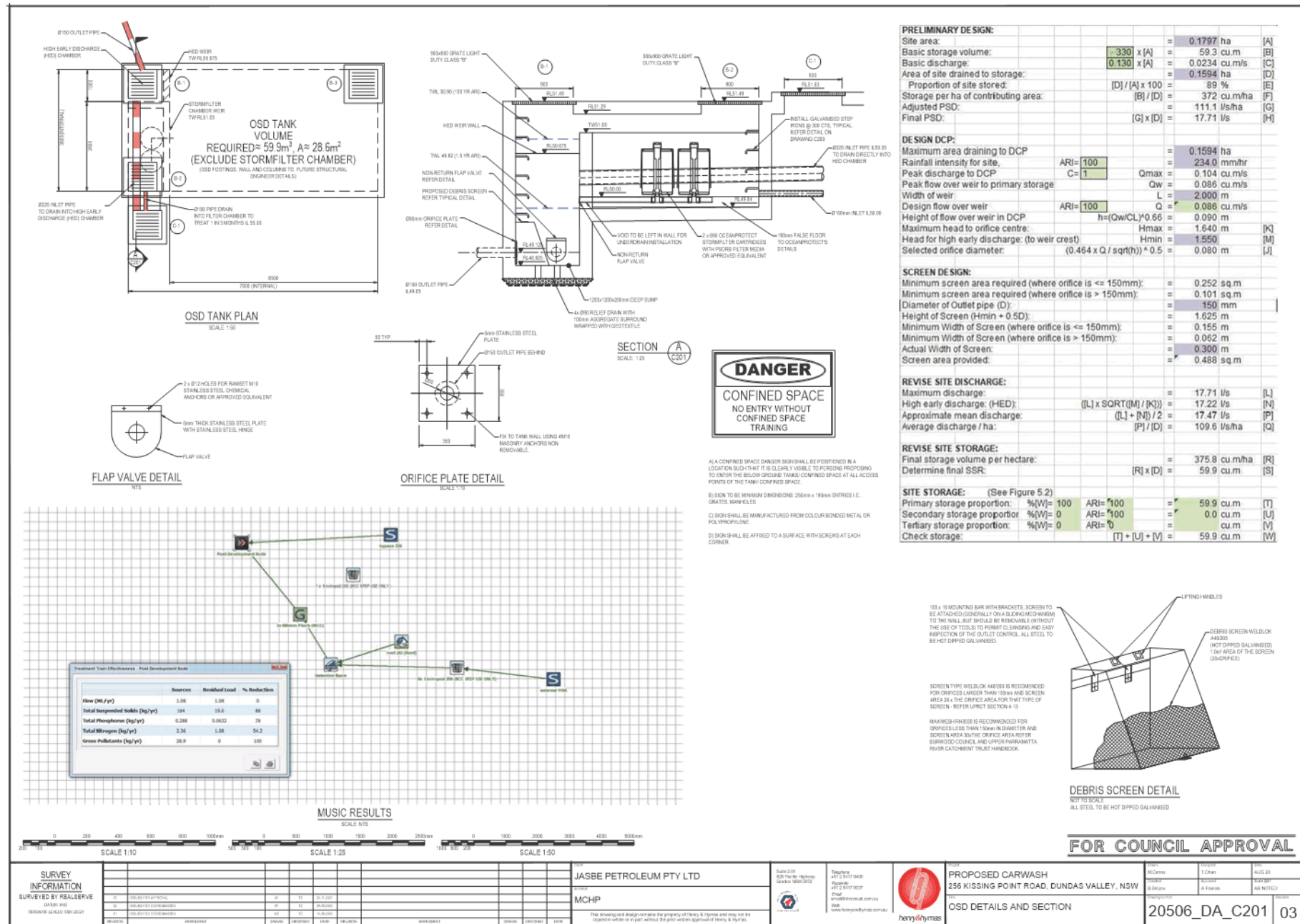
SHOULD DISCREPANCIES BE ENCOUNTERED DURING CONSTRUCTION BETWEEN THE SURVEY DATA AND ACTUAL FIELD DATA, CONTACT HENRY AND HYMAS PTY. LTD. THE FOLLOWING NOTES HAVE BEEN TAKEN DIRECTLY FROM ORIGINAL SURVEY DOCUMENTS.

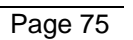
ISSUED FOR CO-ORDINATION

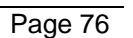
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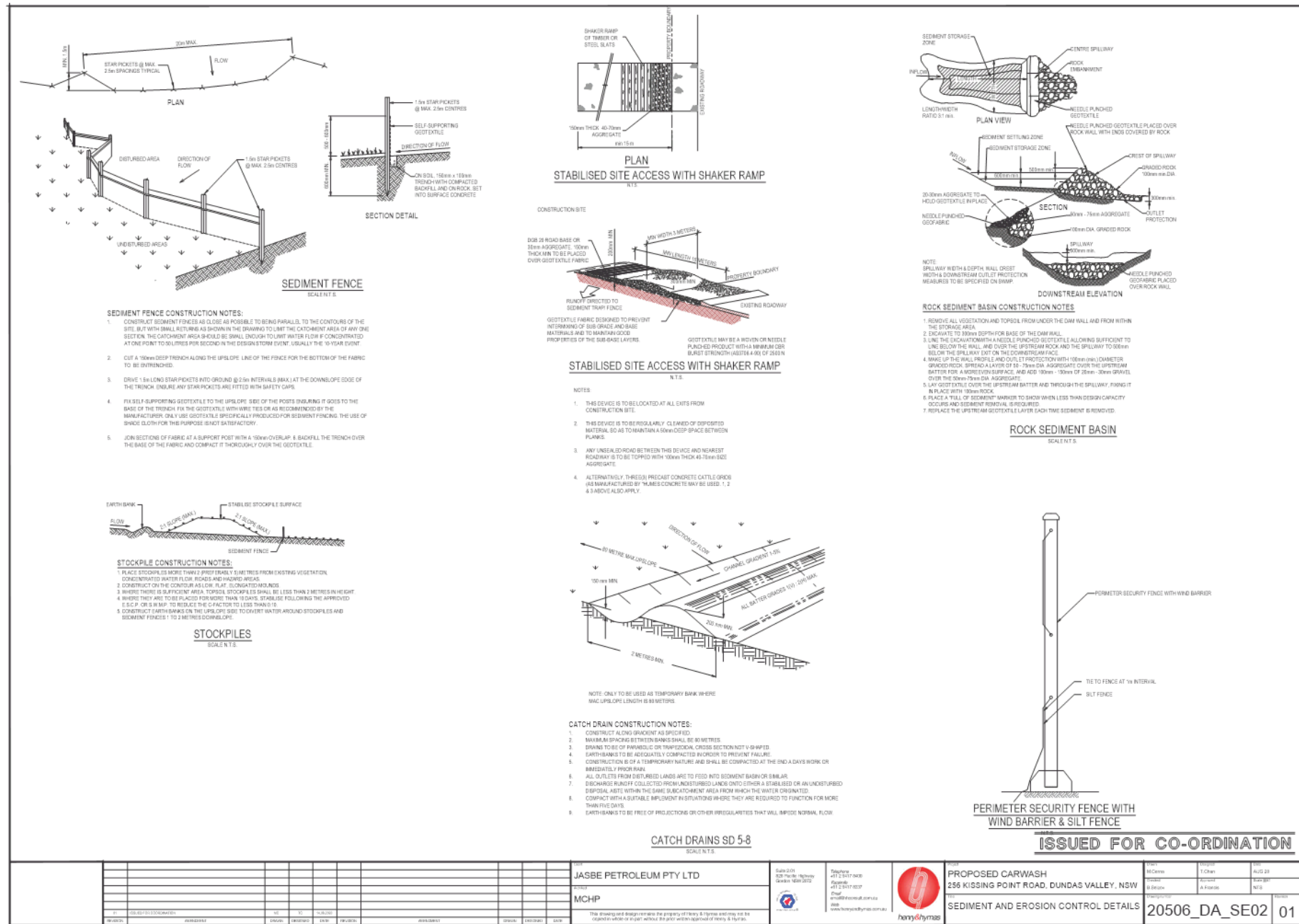


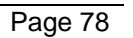


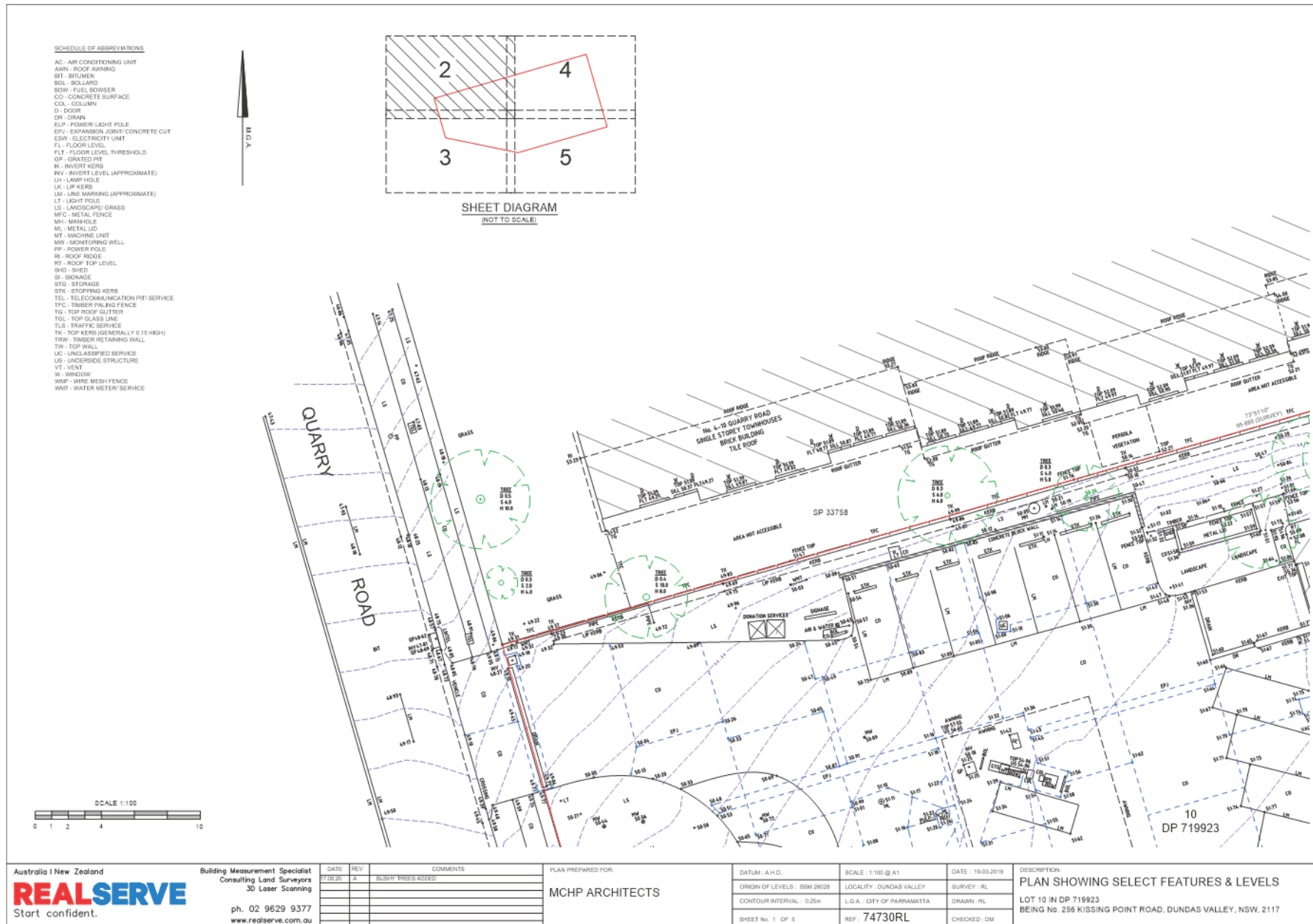


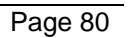


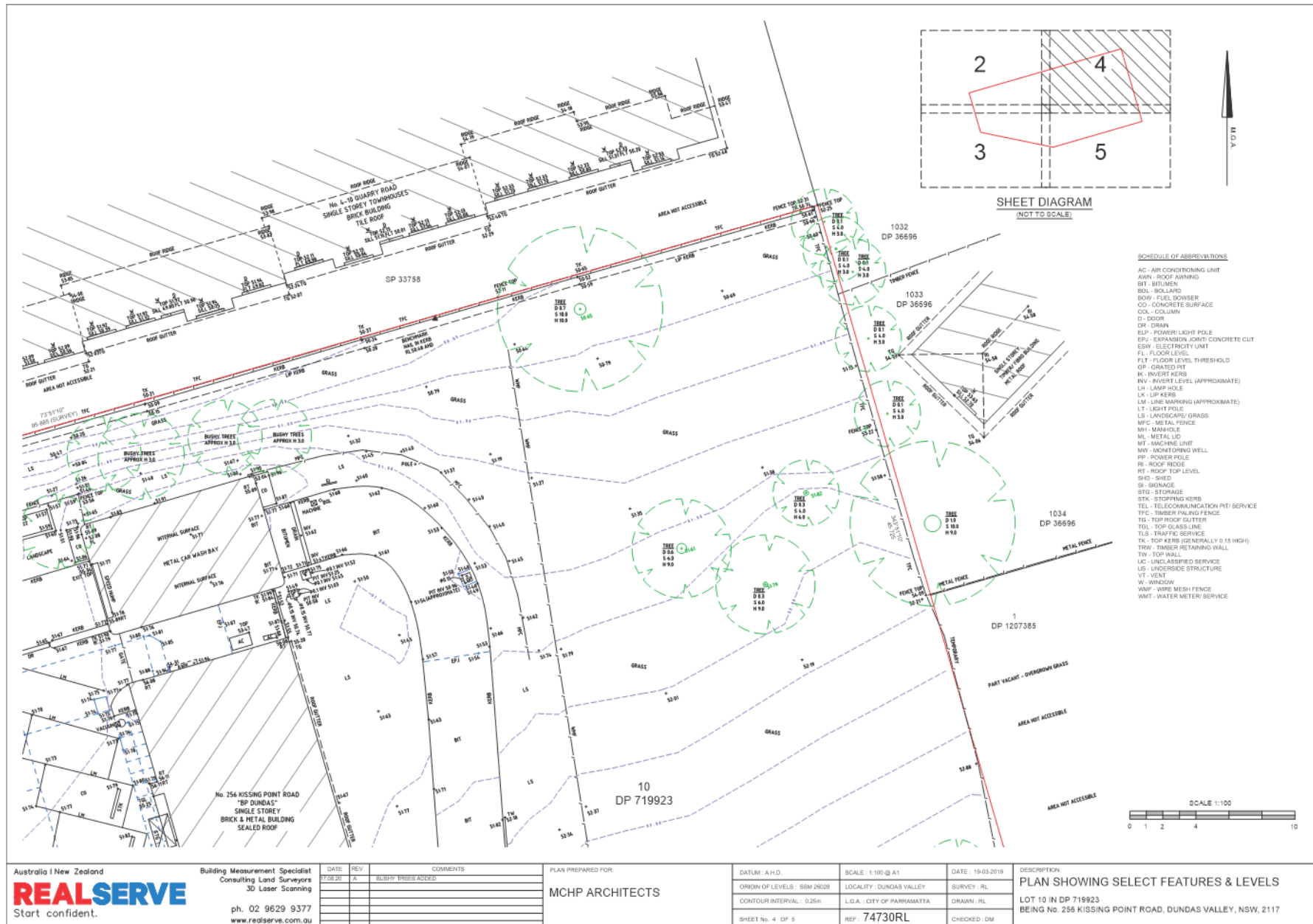


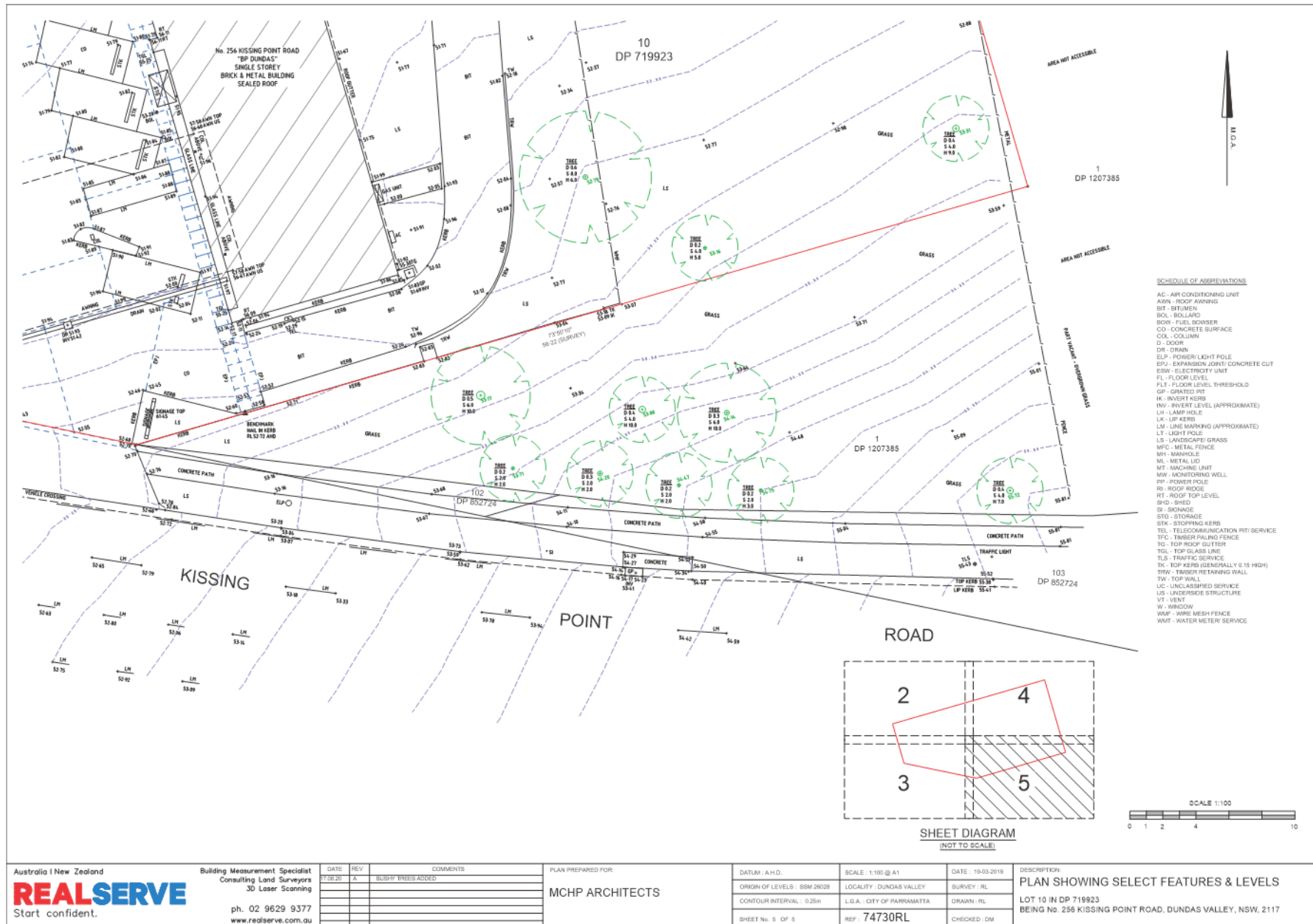












256 Kissing Point Road, Dundas NSW 2117

MANAGEMENT PLAN

INTRODUCTION

1. This document is the “Plan of Management” (the Plan) for the premises located at 256 Kissing Point Road, Dundas (the Premises)
2. The Plan has been developed to assist site staff in the management of operations associated with the Premises
3. The Premises is intended to operate with the following operating hours:
 - i. Monday to Sunday 24 hours
4. It is expected that as a condition of consent that the Premises be operated in accordance with the Plan
5. The Premises must operate in accordance with the Consent and this Plan at all times. Where there is inconsistency between the conditions on the Consent and this Plan, then the conditions of the Consent will prevail

PLAN TO BE AVAILABLE

1. A copy of this Plan including any attachments, is to be kept at the Premises at all times and will be made available for inspection by employees, contractors, customers, vendors, Police, Council and any other Regulatory Authority upon request

SECURITY ON SITE

1. The number one priority of the site operator is to maintain the health, safety and personal security of every staff member, customer and invitee to the site
2. Failure of Site Staff to comply with Operational Security Policies and Practices may result in disciplinary action, including possible termination of employment

OPERATIONAL ISSUES

1. The site manager will provide adjoining residents and business owners with their contact telephone number. Should this contact number or site manager change, then adjoining residents and business owners are to be updated within 14 days. Contact details of the adjoining residents and business owners should also be obtained and updated frequently to communicate any site issues that may arise
2. The site staff in conjunction with the site manager must not cause, permit or allow and invitee to remain on the Premises without reasonable excuse after completing a purchase/transaction or car wash
3. All site staff in conjunction with the site manager are to take steps to discourage loitering at site by invitees

STORE SECURITY

1. In order to maintain a secure work environment, the store must be operated in the following manner:
 - a. The shop area is to be kept neat and tidy both inside and out so as to maintain clear visibility toward staff and invitees
 - b. All lighting systems both within the shop area and forecourt are to be maintained in good working order at all times so as to improve security for staff, invitees and the surrounding neighbourhood in general
 - c. Landscaping on site is to be maintained at a level whereby forecourt and site perimeter visibility is not compromised
 - d. The Site Manager will be encouraged to create and maintain strong relationships with local police and support "Neighbourhood Watch" programs and initiatives
 - e. All site staff are to remain vigilant of any and all suspicious activities and report the same to the site manager. The site manager in turn is to take appropriate action including and not limited to alarm activation and/or contact the local Police
 - f. All staff to adhere to operational cash drop procedures so as to minimise cash on hand at any time through regular cash drops to secure safes on site
 - g. All site staff are to actively avoid being drawn into conflict on site, whether or not it is between staff or with invitees or between invitees. In any such situation site staff are to immediately contact the site manager and/or local Police
 - h. If site staff or invitees are injured whilst on site, the staff member is to immediately contact the site manager and or Ambulance and issue First Aid only if qualified to do so
 - i. Adhere to the following measures to ensure security:
 - i. **BE ALERT**
 - ii. **AVOID BEING DRAWN INTO ANY CONFLICT**
 - iii. **REPORT ALL THREATS, NO MATTER HOW SMALL**
 - iv. **DICOURAGE LOITERING**
 - v. **REPORT ANY AND ALL SUSPCIOUS ACTIVITY**

CAR WASH OPERATION

1. In order to maintain a safe and secure environment and to mitigate any adverse impacts on surrounding neighbours, the car wash must be operated in the following manner:
 - a. The car wash area is to be kept neat and tidy so as to maintain clear visibility toward staff and invitees
 - b. Site staff are to inspect the car wash area to pick up and remove any litter and empty rubbish bins at least twice daily
 - c. Rubbish bins should not be emptied between the hours of 10pm and 7am Monday to Saturday and 10pm and 8am on Sunday

- d. All lighting systems both within the car wash area are to be maintained in good working order at all times so as to improve security for staff, invitees and the surrounding neighbourhood in general
- e. Perimeter and car wash lights (apart from security lighting) should be turned off if the car wash is not in operation
- f. Landscaping on site is to be maintained at a level whereby car wash and site perimeter visibility is not compromised
- g. All CCTV systems are to be maintained in good working order, so site staff can monitor activities within the car wash area at all times
- h. Site staff are to remain vigilant for any suspicious behaviour or anti-social activities in the car wash area. Any suspicious or anti-social behaviour should be immediately reported to Police
- i. Except in the event of emergency, staff access to the Car Wash Plant room for receiving deliveries or maintenance is not permitted between the hours of 10pm and 7am Monday to Saturday and 10pm and 8am on Sunday
- j. Any public address system in the Car Wash area must not be used between the hours of 10pm and 7am Monday to Saturday and 10pm and 8am on Sunday
- k. Signage is to be maintained in both the car wash and vacuum bays that states: "Please respect our neighbours by keeping noise levels down and turning off your car stereo"
- l. Signage is to be maintained on entrances and throughout the site that states: "CCTV in use 24 hours" to deter suspicious and anti-social behaviour

TOILET FACILITIES

1. The Site Manager is to ensure that toilet facilities are kept in a clean and operational manner and have these available for staff and invitees to use

RUBBISH PICKUP

1. All rubbish bins are to remain within the bin corral and only brought out at times of collection. Once emptied, bins are to be returned to the bin area

GENERAL REPORTING AND INCIDENT MANAGEMENT

1. The site is to maintain an "Incident Book" on site. This book shall be used to log complaints, incidents, etc and shall be available for Council, Police and adjoining neighbours who live within 100m of the Premises to view if requested
2. All matters logged in the Incident Book shall include details of the incident, the date and time that the incident occurred along with identifying the person logging the incident, along with their contact details. The staff person responsible to resolve the issue shall also be identified along with an anticipated timeline to resolve the matter
3. An "Incident" includes:
 - i. Any breach of this Plan, or
 - ii. Any complaint made about the operation of the Premises including noise, or

- iii. Any event that occurs as a result of staff or invitees to the Premises
- 4. All matters logged within the Incident Book must be updated within 24 hours from the time at which the incident occurred
- 5. The site Manager must be contactable within trading hours to deal with any incident that occurs at the Premises otherwise, escalation to management must occur so as to resolve the matter in a quick, effective and efficient manner.
- 6. If an incident is noise related, the site manager must:
 - i. Rectify the situation as soon as possible
 - ii. Contact the person reporting the Incident to verify that the matter has been addressed
 - iii. Take all reasonable measures to stop or reduce the source of noise to minimise future occurrences
- 7. The Site Manager is to review the Incident Book on a regular basis and make any necessary operational and/or procedural changes to minimise the possibility of the incident reoccurring

REVIEW PROCESS

The Plan of Management shall be reviewed annually or as agreed with, and in liaison with Council to update and incorporate any operational or procedural changes deemed necessary to improve the operation of the site and reduce Incidents from occurring

CARWASH ENVIRONMENTAL MANAGEMENT PLAN				
Jasbe Dundas Pty Ltd				
BP Dundas				
256 Kissing Point Rd				
DUNDAS VALLEY, NSW 2117				
This Carwash Environmental Management Plan (EMP) has been developed for the operation of a facility designed to undertake carwash activities at service stations. It provides an overview of the management of environmental risks to demonstrate that the activities being undertaken are acceptable and that there are appropriate controls in place to manage risks to the environment.				
Description of Activity				
BP Dundas (the Site) is a retail service station selling a range of petroleum products to the public. The Site operates 24 hours a day, seven days a week. A range of pre-packed auto parts are sold at the Site, along with a range of food items prepared by the onsite restaurant. The site operates a carwash facility, which is capable of washing passenger and other light vehicles.				
Environmental Objectives				
—To provide a means to identify site specific environmental issues and assess potential risk of these to the environment. —To identify the management strategies and mitigations to be implemented to minimise the risk of environmental harm. —To provide a mechanism to assist Jasbe in complying with relevant environmental legislation and regulations.				
Scope of the Document				
This Carwash Environmental Management Plan is limited to the carwash to be located at the service station facility.				
Contents				
Section A	Carwash Site Information			
Section B	Environmental Controls			
Section C	Incident and Emergency Management Procedures			
Section D	Maintenance Schedule			
Section E	Records			
Section F	Plans and Drawings			
Section G	Licenses and Authorisations			
Section H	Abbreviations			
DOCUMENT NUMBER: P01004-009				
Revision	Author	Reviewed By	Revision Description	Revision Date
1	S Holland	P Morgan	Draft	16-Aug-21

Section A: Carwash Site Information			
A1. General Site Information			
Site Name	BP Dundas		
Site Street Address	155 Kissing Point Rd		
Site Suburb, State and Postcode	Dundas Valley NSW 2117		
Property Description	Operational BP branded service station and convenience store with carwash facilities.		
Site Contact Name and Number	Prementhay Jayathilagan 0415 041 068		
Zoning	R2 - Low Density Residential		
Access	24 hr site - via Retail Shop		
SECTION F: Refer to 'Figure 1: Carwash Layout Plan'			
A2. Site Contact Details			
Emergency Response Contacts *			
BP Australia Emergency Response (24/7)	1800 18 27 27		
TFA NSW	131 555		
SES NSW	132 500		
Endeavour Energy	02 9853 6141		
Sydney Water	131 450		
Terranova Gas Networks (NSW)	131 909		
National Poisons	131 126		
Fire and Rescue NSW	Triple Zero (000)		
Denug Custodian Aboriginal Corporation	0415 770 163		
Section C3: Refer to 'Emergency Contact Register'			
Responsible Employee for Environmental Management of Carwash			
Jasbe NSW Operations Manager	MD Alamiah 041 3835262 md.alamiah@jasbe.com.au		
Store Manager	Prementhay Jayathilagan 0415 041 068		
Maintenance Contacts			
Backflow water valve checks	Equip Plumbing Solutions 0425 268 411	Frequency of maintenance activity Annual	
Carwash triple interceptor cleanout service	Cleanaway Waste Management Ltd 13 13 39	2 monthly (depending on volume) otherwise 6 monthly	
Carwash General repairs & maintenance	Washbac P/L 1300 257 378	3 monthly	
A3. Description of Current Infrastructure and Activities			
A3(a) Carwash Facility Description			
Automatic Car Wash has an inbuilt Reclamation System to recycle water within the system. Discharged wastewater from manual and automatic wash system is run through an Oil Interceptor. All manual and automatic wash bays have silt traps built into the entry of the drainage system for manual cleaning by maintenance contractors. The facility consists of two automatic carwash bays as well as 3 manual wash bays. Four vacuum bays will also form part of the facility.			
A3(a) Description of Current Chemical Storage for the Carwash Facility			
Product Type	Clean up requirements for Spills	GHS Classification	Usage
AAP EXTREME SHINE WAX SGL	Contain spillage. Neutralize with chalk, alkali solution or ammonia and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations.	CLASS 3 PG 11	Vehicle Care – Wax
AAP VELOCITY CLEAR COAT PROTECT SGL	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations. Keep in suitable, closed containers for disposal.	CATEGORY 4 CATEGORY 4 CATEGORY 1B CATEGORY 1 CATEGORY 1	Protective Coating
BCL HI PH 3688 SGL	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations. Flush away traces with water. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway.	CATEGORY 1	Pre-soak
BLUE CORAL HI PH 3692	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations. Flush away traces with water. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway.	CATEGORY 1	Pre-soak
BCL PRESOAK LIME SGL	Keep in suitable, closed containers for disposal. Clean contaminated floors and objects thoroughly while observing environmental regulations.	CATEGORY 1, CATEGORY 1A	Pre-soak
BCL SOILAWAY SGL	Neutralise with acid. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Keep in suitable, closed containers for disposal.	CATEGORY 1, CATEGORY 1A	Vehicle Soap
BCL TIRE & ENGINE CLNR SGL	Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Sweep up or vacuum up spillage and collect in suitable container for disposal.	CATEGORY 1, CATEGORY 1A	Vehicle Tire & Engine Cleaner
MA-3 SHAMPOO	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations.	CATEGORY 2A	Vehicle Soap
SECTION F: Refer to Figure 'Drawing Number: 'A100' Proposed Carwash Layout'			

Section B: Environmental Controls to Minimise or Eliminate Pollution Impacts		
B1: Environmental Aspects		
B1(a) Aspects & Impacts		
Aspect	Description of Control	Frequency of Control Inspection
Waterway Pollution	Runoff is collected in the triple interceptor pit. Drain mats are used in the case of a spill from any product used in the carwash itself.	Daily
Noise Control	The Carwash is permitted to operate 24 hours a day, 7 days a week. Signage will be mounted at the carwash site and vacuum bays encouraging users to keep noise to a minimum when using the facilities. E.g. Minimising loud music etc. Noise levels emanating from the premises must comply with the requirements of the NSW Environment Protection Authority's "Protection of the Environment Operations (Noise Control) Regulation 2017".	Daily
Chemical Storage	Chemicals are to be stored within the Carwash Plant Room, located within the carwash facility itself.	Daily
Spill Clean-up/Response	A spill kit is located between the sales building (See Figure 2) and the Carwash. Drain mats are to be used immediately in the event of a spill and isolation of spill source is to occur immediately if safe to do so.	Daily
Light Pollution	Lighting and illuminated signage installed at the site is to be baffled and located at the facilities in a way that minimises adverse impacts from light pollution.	Daily
Odour	Odour emissions from the premises must be controlled so as not to cause a nuisance (as defined by the Public Health and Wellbeing Act, 2008)	Daily
B2: Staff Training		
<p>Induction and training is provided to all Jasbe employees, with training requirements tailored to the nature of the work to be conducted.</p> <p>The general training requirements of all Jasbe staff are outlined below:</p> <p>All staff are required to undertake online training modules in i-Connect (online portal) and in-store modules using CTF book and fuel assessment forms. On completion of online and in-store training modules, all staff are required to complete Emergency Response Training.</p> <p>All training records are filed in-store and electronically in Jasbe data room.</p>		
SECTION E1: Refer to "Records kept On-Site"		

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SECTION B1: Refer to "Records kept On-Site"		

Section C: Incident and Emergency Management Procedures			
In the case of an incident or emergency, Jasbe have a range of procedures and work instructions that document the roles, accountabilities and actions to be taken to manage incidents and emergency response situations.			
Key procedures are detailed below:			
Site Emergency FlipChart: Emergency response to a range of incidents, including fuel spills, is outlined in this document. A copy is available onsite.			
MSDS: The Site has an MSDS file for all chemicals kept at the site. The file is located in the within the service station. The MSDS details the handling and emergency response procedures for specific products. It is intended that the MSDS set for the carwash is to be kept in its own folder within the building for ease of reference when required.			
Incident Reporting and Investigation Procedure: To ensure that all HSE Events (Incidents, Near Misses and Unsafe Acts or Conditions) are reported and recorded, and where required are investigated so as to prevent the recurrence of similar incidents.			
C1. Fire or Explosion			
In the event of a fire or explosion, the Site has a Site Emergency FlipChart to assist store staff in managing such incidents. An escalation system is in place to ensure appropriate support and resources can be allocated to manage the situation. There are fire extinguishers located at the Site, and they are identified on the site plan attached as the back of the on-site, hard copy Site Emergency FlipChart.			
C2. Incident Reporting			
Incidents: Are reported using the 'HSE Incident Report Form' - BP branded Dealer sites (incident form).			
The Incident Form is completed by the staff member who encounter the incident, and then it is given to the Site Manager for further action.			
The Jasbe NSW Operations Manager is then notified of the incident so that an investigation can be carried out to reconcile the incident and avoid future issues.			
C3. Emergency Contact Register			
Refer to A.2 for relevant Site Emergency Contacts, and is the resource that site staff will use. Details of emergency service providers are re-iterated below.			
Emergency Type	Authority / Service Provider Name	Contact Person	Contact Number(s)
Fire / Petroleum Spill	NSW Emergency Service	N/A	000
LPG Leak	NSW Emergency Service	N/A	000
Environmental Regulator or Appropriate Regulatory Authority (ARA)	NSW EPA	N/A	131 555
Emergency Spill Advice	NSW EPA	NSW EPA Environmental Line	131 555
Dangerous Goods	SafeWork NSW	Customer Service Centre - Notifiable Incident	131 050
Water	Sydney Water	N/A	131 450
Energy / Power	Endeavour Energy	N/A	02 9853 6141
Gas	Jemena NSW	N/A	131 989
Carwash Facility Maintenance (Reactive and Preventative)	WashTec Pty Ltd	N/A	1300 257 378
Triple Interceptor Pit Maintenance (Reactive and Preventative)	Cleanaway Waste Management Ltd	N/A	13 13 39

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LPG Leak	NSW Emergency Service	N/A	000
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Emergency Spill Advice	NSW EPA	NSW EPA Environmental Line	131 555
Dangerous Goods	SafeWork NSW	Customer Service Centre - Notifiable Incident	131 050
Water	Sydney Water	N/A	131 450
Energy / Power	Endeavour Energy	N/A	02 9853 6141
Gas	Jemena NSW	N/A	131 989
Carwash Facility Maintenance (Reactive and Preventative)	WashTec Pty Ltd	N/A	1300 257 378
Triple Interceptor Pit Maintenance (Reactive and Preventative)	Cleanaway Waste Management Ltd	N/A	13 13 39



fuel tanker spills

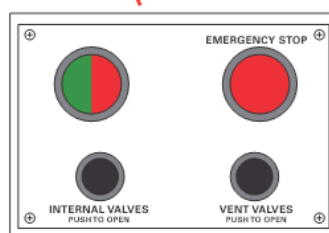
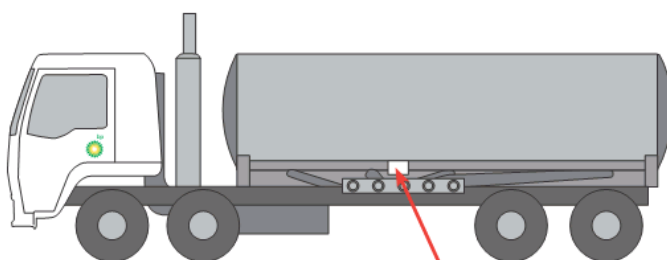
emergency procedure

TANKER LEAKAGE

If the source of the leakage is a tanker and the tanker driver is unable to respond, please follow the instructions below.

ONLY IF IT IS SAFE TO DO SO.

To prevent fuel from further escaping from the fuel tanker, activate the fuel tanker's 'emergency stop button'. This button is located on the 'air control panel', as shown on below diagram.



8

contain. isolate. escalate.



major fuel spills or leaks

A major spill is where the quantity of fuel involved is:

- A - 10 Litres or more (e.g. spill >2m x 2.5m) and/or
- B - has made it to the drains or offsite and/or
- C - cannot be contained.

- 1 Press the emergency stop button.
- 2 Call the Fire Brigade on **000** to attend the store to clean up the spill.
- 3 Alert all customers to the situation via the public address system and ask them not to start their vehicles until the Fire Brigade has attended and finished cleaning up the spill.
- 4 If safe to do so, confirm there are no ignition sources.
- 5 Contain the spill as best you can using the spill kit and spill kit instructions (e.g. Cover the drains to prevent fuel from entering the storm water system).
- 6 Close site.
- 7 Call **BP Emergency Response Number on 1800 18 27 27**. This number connects you to a call centre that is manned 24 hours a day. The call centre has the detail of your store and will contact your BP business manager. This allows you to manage the incident. Someone from BP will contact you.
- 8 Notify your Store Manager by voice. If they are unavailable continue to manage the incident and await contact from BP Personnel.
- 9 Re-open the site when directed it is safe to do so from the BP Personnel.
- 10 Complete an Incident Report Form.

contain. isolate. escalate.

9



minor fuel spills or leaks

A minor spill is where the quantity of fuel involved is:

A - 10 Litres or less and/or

B - has **not** made it to the drains or offsite and/or

C - can be contained.

- 1 Isolate spill.
- 2 Move customers away from the area.
- 3 Refer to the instructions in the spill kit for instructions to clean up minor spills.
- 4 Notify your Store Manager by voice.
- 5 Complete an Incident Report form.



contain. isolate. escalate.

10



major fuel spill on person's clothing

- 1 Immediately shut down all pumps.
- 2 Use the public address system to ask customers not to start their vehicles and inform them that there has been a fuel spill at the site.
- 3 If it is a major fuel spill, call the Fire Brigade on **000**, as per the 'Major Fuel Spill and Leaks' procedure.
- 4 Do not allow the person to remove the affected clothing as this may generate a static electricity spark. Wet the affected persons' clothing with cold water until it is completely saturated.
- 5 Call the Ambulance on **000** if required (e.g. fuel has splashed in the persons eye).
- 6 Once completely saturated with cool water, allow the person to remove the affected clothing if required. Provide anything you can to assist the person (e.g. overalls from the spill kit).
- 7 Clean up any spill on the ground in accordance with the 'Major Fuel Spills and Leaks' instructions in this Flipchart.
- 8 Call **BP Emergency Response Number on 1800 18 27 27**. This number connects you to a call centre that is manned 24 hours a day. The call centre has the detail of your store and will contact your BP business manager. This allows you to manage the incident. Someone from BP will contact you.
- 9 Notify your Store Manager by voice. If they are unavailable continue to manage the incident and await contact from BP Personnel.
- 10 Complete an Incident Report Form.

contain. isolate. escalate.

11



LPG tanker leaks

emergency procedure

TANKER LEAKAGE

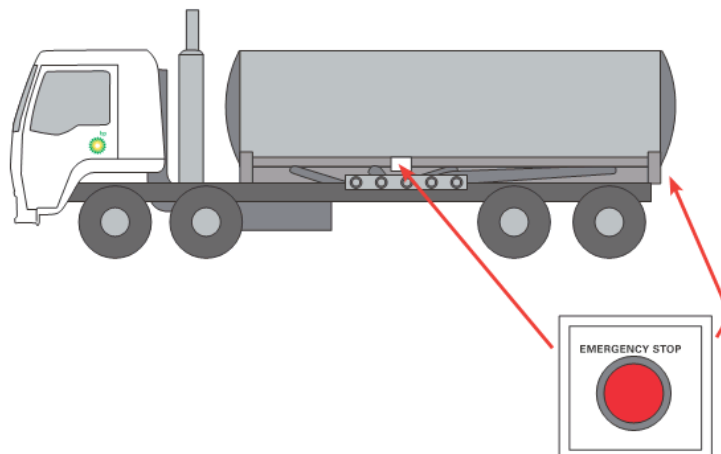
If the source of the leakage is a tanker and the tanker driver is unable to respond, please follow the instructions below.

ONLY IF IT IS SAFE TO DO SO.

To prevent gas from further escaping from the LPG tanker activate one of the tanker's Emergency Stop Buttons.

One button is located on the air control panel, on the left hand side, in the middle of the tanker (refer to diagram).

The other button is located on the right hand side at the rear of the tanker (refer to diagram).



12

contain. isolate. escalate.



LPG leak

emergency procedure

Please put on PVC gloves and Safety Goggles to prevent the gas from coming in contact with your skin. An LPG Leak at a store may occur from an LPG tanker, an LPG tank, a vehicle, the LPG pumping equipment or a portable gas cylinder (e.g. 'Swap n Go').

- 1 Press the LPG emergency stop button.
- 2 Shut down all other pumps.
- 3 If the leak is coming from a portable gas cylinder or vehicle and has been stopped by closing the valve or using the brass cap, complete Step 9 & 12 **only**. Otherwise proceed with the following steps.
- 4 Call the Fire Brigade on **000**.
- 5 Use public address system to ask customers not to start their vehicles. Instruct customers that the site is being evacuated and ask customers to move to your site's Emergency Evacuation Point. Customers are to remain there until they are advised it is safe to return.
- 6 Turn off the power at the main switchboard.
- 7 If it is safe to do so, remove all ignition sources.
- 8 Call **BP Emergency Response Number on 1800 18 27 27**. This number connects you to a call centre that is manned 24 hours a day. The call centre has the detail of your store and will contact your BP business manager. This allows you to manage the incident. Someone from BP will contact you.
- 9 Notify your Store Manager by voice. If they are unavailable continue to manage the incident and await contact from BP Personnel.
- 10 Evacuate site as per the 'Emergency Evacuation Procedure' in this Flipchart.
- 11 Do not re-open site until you have received instruction to do so by BP Personnel.
- 12 Complete an Incident Report Form.

contain. isolate. escalate.

13

Section D: Maintenance Schedule				
D1. Maintenance Schedule				
D1(i) Carwash Maintenance Schedule				
Details of Carwash maintenance items and scheduling:				
Equipment Description	Maintenance Frequency	Responsible Person	Contact	Contractor undertaking works
Carwash & Ancillary Facilities General Maintenance	Quarterly	Store Manager	02 9630 7005	WashTec Pty Ltd
Triple Interceptor Pit Maintenance	Quarterly (otherwise 6 monthly depending on rate of sediment accumulation)	Store Manager	02 9630 7005	Cleanaway Waste Management Ltd
D2. Inspection and Audit Program				
Details of the range of inspections and audits which the Site is subject to can be found below:				
Audit / Inspection	Frequency	Conducted By	Details	
Overall Site Checklist	Daily	Store Manager or Delegate	Inspections inside and outside of the store, including functionality and accessibility of site emergency response equipment, identification of carwash maintenance issues, checks of monitoring equipment and general cleanliness of the carwash work area.	
Safety Audit	Quarterly	Jobse NSW Operations Manager	To observe, discuss, demonstrate and review critical safety at the site. It includes verification that the Overall Site Checklist has been adhered to and that all staff are up to date with training requirements.	
Environmental Compliance Audit	Biannually	Jobse NSW Operations Manager	Environmental aspects of site operation are audited to verify compliance with regulatory requirements and environmental best practice.	
D3. Equipment Specifications				
Details of the manufacturer equipment specifications are detailed below:				
Document			Location	
WashTec Operating Instructions - Roll-over car wash system			Carwash Plant Room	
SoftCare Pro Touchless / Pro Takt Type ST10/TM10 Version: 22.05.2018			Jobse Data Room	
GinSan Industries - Direct Drive System (Manual Wash Bays)				

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GinSan Industries - Direct Drive System (Manual Wash Bays)				

Section E: Records	
E1: Records Kept On-Site	
Document	Location
Site Emergency FlipChart	At console for immediate access
Staff Training Records	
Incident Report Form	
MSDS	
E2: Records Kept Off-Site	
Document	Location
Dangerous Goods Notification	Jesbe data room
Flammable and Combustible Goods License	
As Built Drawings	
Trade Waste Permit	
Waste Collection Contracts and Invoices	
UPSS Tank, Pipework and Equipment	
Aboveground Fuel Infrastructure	
Forecourt Pollution Control System Details	
Environmental Site Assessments, Well Installation Records and Validation Reports	
Groundwater Monitoring Events	
Maintenance and Calibration Records	
Fuel Stock Management Records	



SAFETY DATA SHEET

MA-3 SHAMPOO

Section: 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : MA-3 SHAMPOO

Other means of identification : Not applicable.

Recommended use : Cleaning product

Product dilution information : 0.5 % - 1.3 %

Company : VELOCITY VEHICLE CARE PTY LTD
27-33 Tottenham Pde
Tottenham, VIC, Australia, 3012
1300 990 074

Emergency telephone number : 1800 127 406 Australia
: 0800 243 622 New Zealand

Issuing date : 28.06.2016

Section: 2. HAZARDS IDENTIFICATION

GHS Classification

Product AS SOLD

Serious eye damage/eye irritation : Category 2A

Product AT USE DILUTION

Not a hazardous substance or mixture.

GHS Label element

Product AS SOLD

Hazard pictograms :



Signal Word : Warning

Hazard Statements : Causes serious eye irritation.

Precautionary Statements : **Prevention:**
Wash skin thoroughly after handling. Wear eye protection/face protection.
Response:
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/ attention.

Product AT USE DILUTION

Precautionary Statements : **Prevention:**
Wash hands thoroughly after handling.
Response:
Get medical advice/ attention if you feel unwell.
Storage:
Store in accordance with local regulations.

SAFETY DATA SHEET

MA-3 SHAMPOO

Product AS SOLD

Other hazards : None known.

Section: 3. COMPOSITION/INFORMATION ON INGREDIENTS

Product AS SOLD

Pure substance/mixture : Mixture

Chemical Name	CAS-No.	Concentration: (%)
sodium dodecylbenzene sulfonate	25155-30-0	10 - 30
1-(2-methoxy-2-methylethoxy)-2-propanol	34590-94-8	1 - 5
alkylethersulphates	68891-38-3	1 - 5

Product AT USE DILUTION

No hazardous ingredients

Section: 4. FIRST AID MEASURES

Product AS SOLD

- In case of eye contact : Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention immediately.
- In case of skin contact : Wash off immediately with plenty of water for at least 15 minutes. Use a mild soap if available. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention immediately.
- If swallowed : Rinse mouth with water. Do NOT induce vomiting. Never give anything by mouth to an unconscious person. Get medical attention immediately.
- Contact the Poison's Information Centre (eg Australia 13 1126; New Zealand 0800 764 766).
- If inhaled : Remove to fresh air. Treat symptomatically. Get medical attention if symptoms occur.
- Protection of first-aiders : If potential for exposure exists refer to Section 8 for specific personal protective equipment.
- Notes to physician : Treat symptomatically.
- Most important symptoms and effects, both acute and delayed : See Section 11 for more detailed information on health effects and symptoms.

Product AT USE DILUTION

- In case of eye contact : Rinse with plenty of water.
- In case of skin contact : Rinse with plenty of water.
- If swallowed : Rinse mouth with water.
- Contact the Poison's Information Centre (eg Australia 13 1126; New Zealand 0800 764 766).

SAFETY DATA SHEET

MA-3 SHAMPOO

If inhaled : Get medical attention if symptoms occur.

Section: 5. FIREFIGHTING MEASURES

Product AS SOLD

- Suitable extinguishing media : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
- Unsuitable extinguishing media : None known.
- Specific hazards during firefighting : Not flammable or combustible.
- Hazardous combustion products : Decomposition products may include the following materials:
Carbon oxides
Sulphur oxides
- Special protective equipment for firefighters : Use personal protective equipment.
- Specific extinguishing methods : Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. In the event of fire and/or explosion do not breathe fumes.

Section: 6. ACCIDENTAL RELEASE MEASURES

Product AS SOLD

- Personal precautions, protective equipment and emergency procedures : Ensure adequate ventilation. Keep people away from and upwind of spill/leak. Avoid inhalation, ingestion and contact with skin and eyes. When workers are facing concentrations above the exposure limit they must use appropriate certified respirators. Ensure clean-up is conducted by trained personnel only. Refer to protective measures listed in sections 7 and 8.
- Environmental precautions : Do not allow contact with soil, surface or ground water.
- Methods and materials for containment and cleaning up : Stop leak if safe to do so. Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13). Flush away traces with water. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway.

Product AT USE DILUTION

- Personal precautions, protective equipment and emergency procedures : Refer to protective measures listed in sections 7 and 8.
- Environmental precautions : No special environmental precautions required.
- Methods and materials for containment and cleaning up : Stop leak if safe to do so. Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13). Flush away traces with water. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway.

SAFETY DATA SHEET

MA-3 SHAMPOO

Section: 7. HANDLING AND STORAGE

Product AS SOLD

Advice on safe handling : Do not ingest. Do not breathe dust/fume/gas/mist/vapours/spray. Use only with adequate ventilation. Wash hands thoroughly after handling. Do not get in eyes, on skin, or on clothing.

Conditions for safe storage : Do not store near acids. Keep out of reach of children. Keep container tightly closed. Store in suitable labeled containers.

Storage temperature : 5 °C to 45 °C

Product AT USE DILUTION

Advice on safe handling : Wash hands after handling. For personal protection see section 8.

Conditions for safe storage : Keep out of reach of children. Store in suitable labeled containers.

Section: 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Product AS SOLD

Components with workplace control parameters

Components	CAS-No.	Form of exposure	Permissible concentration	Basis
1-(2-methoxy-2-methylethoxy)-2-propanol	34590-94-8	TWA	50 ppm 308 mg/m ³	AU OEL

Engineering measures : Effective exhaust ventilation system. Maintain air concentrations below occupational exposure standards.

Personal protective equipment

Eye protection : Safety glasses with side-shields

Hand protection : Wear the following personal protective equipment: Standard glove type.

Skin protection : Wear suitable protective clothing.

Respiratory protection : No personal respiratory protective equipment normally required.

Hygiene measures : Handle in accordance with good industrial hygiene and safety practice. Remove and wash contaminated clothing before re-use. Wash face, hands and any exposed skin thoroughly after handling. Provide suitable facilities for quick drenching or flushing of the eyes and body in case of contact or splash hazard.

Product AT USE DILUTION

Engineering measures : Good general ventilation should be sufficient to control worker exposure to airborne contaminants.

Personal protective equipment

Eye protection : No special protective equipment required.

Hand protection : No special protective equipment required.

SAFETY DATA SHEET

MA-3 SHAMPOO

Skin protection	: No special protective equipment required.
Respiratory protection	: No personal respiratory protective equipment normally required.

Section: 9. PHYSICAL AND CHEMICAL PROPERTIES

	Product AS SOLD	Product AT USE DILUTION
Appearance	: liquid	liquid
Colour	: clear, light blue	light yellow
Odour	: hydrocarbon-like	odourless
pH	: 12.0 - 14.0, 100 %	8.5 - 10.5
Flash point	: Not applicable., Does not sustain combustion.	
Odour Threshold	: no data available	
Melting point/freezing point	: no data available	
Initial boiling point and boiling range	: > 100 °C	
Evaporation rate	: no data available	
Flammability (solid, gas)	: no data available	
Upper explosion limit	: no data available	
Lower explosion limit	: no data available	
Vapour pressure	: no data available	
Relative vapour density	: no data available	
Relative density	: 1.02 - 1.05	
Water solubility	: soluble	
Solubility in other solvents	: no data available	
Partition coefficient: n-octanol/water	: no data available	
Auto-ignition temperature	: no data available	
Thermal decomposition	: no data available	
Viscosity, kinematic	: 145.188 mm ² /s (40 °C)	
Explosive properties	: no data available	
Oxidizing properties	: no data available	
Molecular weight	: no data available	
VOC	: no data available	

Section: 10. STABILITY AND REACTIVITY

Product AS SOLD	
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No dangerous reaction known under conditions of normal use.
Conditions to avoid	: None known.

SAFETY DATA SHEET**MA-3 SHAMPOO**

Incompatible materials : Acids
Metals

Hazardous decomposition products : Decomposition products may include the following materials:
Carbon oxides
Sulphur oxides

Section: 11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure : Inhalation, Eye contact, Skin contact

Potential Health Effects**Product AS SOLD**

Eyes : Causes serious eye irritation.

Skin : Health injuries are not known or expected under normal use.

Ingestion : Health injuries are not known or expected under normal use.

Inhalation : Health injuries are not known or expected under normal use.

Chronic Exposure : Health injuries are not known or expected under normal use.

Product AT USE DILUTION

Eyes : Health injuries are not known or expected under normal use.

Skin : Health injuries are not known or expected under normal use.

Ingestion : Health injuries are not known or expected under normal use.

Inhalation : Health injuries are not known or expected under normal use.

Chronic Exposure : Health injuries are not known or expected under normal use.

Experience with human exposure**Product AS SOLD**

Eye contact : Redness, Pain, Corrosion

Skin contact : No symptoms known or expected.

Ingestion : No symptoms known or expected.

Inhalation : No symptoms known or expected.

Product AT USE DILUTION

Eye contact : No symptoms known or expected.

Skin contact : No symptoms known or expected.

Ingestion : No symptoms known or expected.

Inhalation : No symptoms known or expected.

Toxicity**Product AS SOLD**

SAFETY DATA SHEET

MA-3 SHAMPOO

Product

Acute oral toxicity	: Acute toxicity estimate : > 2,000 mg/kg
Acute inhalation toxicity	: no data available
Acute dermal toxicity	: no data available
Skin corrosion/irritation	: no data available
Serious eye damage/eye irritation	: no data available
Respiratory or skin sensitization	: no data available
Carcinogenicity	: no data available
Reproductive effects	: no data available
Germ cell mutagenicity	: no data available
Teratogenicity	: no data available
STOT - single exposure	: no data available
STOT - repeated exposure	: no data available
Aspiration toxicity	: no data available

Components

Acute dermal toxicity	: 1-(2-methoxy-2-methylethoxy)-2-propanol LD50 rabbit: 9,510 mg/kg
	: alkylethersulphates LD50 rabbit: 8,000 mg/kg

Section: 12. ECOLOGICAL INFORMATION

Product AS SOLD

Ecotoxicity

Environmental Effects	: This product has no known ecotoxicological effects.
-----------------------	---

Product

Toxicity to fish	: no data available
Toxicity to daphnia and other aquatic invertebrates	: no data available
Toxicity to algae	: no data available

Components

Toxicity to fish	: sodium dodecylbenzene sulfonate 96 h LC50: 3.2 mg/l
	: 1-(2-methoxy-2-methylethoxy)-2-propanol 96 h LC50 Fish: > 1,000 mg/l
	: alkylethersulphates 96 h LC50 Fish: 7.1 mg/l

Persistence and degradability

no data available

SAFETY DATA SHEET**MA-3 SHAMPOO****Bioaccumulative potential**

no data available

Mobility in soil

no data available

Other adverse effects

no data available

Section: 13. DISPOSAL CONSIDERATIONS**Product AS SOLD**

Disposal methods : Where possible recycling is preferred to disposal or incineration. If recycling is not practicable, dispose of in compliance with local regulations. Dispose of wastes in an approved waste disposal facility.

Disposal considerations : Dispose of as unused product. Empty containers should be taken to an approved waste handling site for recycling or disposal. Do not re-use empty containers.

Product AT USE DILUTION

Disposal methods : Where possible recycling is preferred to disposal or incineration. If recycling is not practicable, dispose of in compliance with local regulations. Dispose of wastes in an approved waste disposal facility.

Disposal considerations : Dispose of as unused product. Empty containers should be taken to an approved waste handling site for recycling or disposal. Do not re-use empty containers.

Section: 14. TRANSPORT INFORMATION**Product AS SOLD**

The shipper/consignor/sender is responsible to ensure that the packaging, labeling, and markings are in compliance with the selected mode of transport.

Land transport (ADG)

Not dangerous goods

Sea transport (IMDG/IMO)

Not dangerous goods

Section: 15. REGULATORY INFORMATION**National regulatory information**

Standard for the Uniform : Schedule 5
Scheduling of Medicines and
Poisons

The components of this product are reported in the following inventories:

United States TSCA Inventory :

On TSCA Inventory

Canadian Domestic Substances List (DSL) :

This product contains the following components that are not on the Canadian DSL nor NDSL.

SAFETY DATA SHEET

MA-3 SHAMPOO

Australia. Industrial Chemical (Notification and Assessment) Act :

On the inventory, or in compliance with the inventory

New Zealand. Inventory of Chemicals (NZIoC), as published by ERMA New Zealand :

not determined

Japan. ENCS - Existing and New Chemical Substances Inventory :

not determined

Japan. ISHL - Inventory of Chemical Substances (METI) :

not determined

Korea. Korean Existing Chemicals Inventory (KECI) :

not determined

Philippines Inventory of Chemicals and Chemical Substances (PICCS) :

not determined

China Inventory of Existing Chemical Substances :

not determined

Section: 16. OTHER INFORMATION

Sources of key data used to compile the Safety Data Sheet

Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

IARC: (International Agency for Research on Cancer)

US. National Toxicology Program (NTP) Report on Carcinogens

ECHA List of Publishable Substances Registered

EU HPVCs (High Production Volume Chemicals)

Issuing date	: 28.06.2016
Date of first issue	: 18.06.2014
version	: 1.1
Prepared by	: Regulatory Affairs

REVISED INFORMATION: Significant changes to regulatory or health information for this revision is indicated by a bar in the left-hand margin of the SDS.

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

Print Date 29/11/2016

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : AAP EXTREME SHINE WAX 5GL

Material number : 000000000000311935

Supplier's details (Australia)

Company : VELOCITY VEHICLE CARE (A.B.N. 166 118 618)

Address : 27-33 Tottenham Pde, Tottenham, VIC, 3012

Telephone : 1300 990 074 (9am -5 pm, Mon-Fri)

Supplier's details (New Zealand)

Company : VELOCITY VEHICLE CARE NZ

Address : 3 London Street, Hamilton 3240.

Telephone : Local 0800 483 562 (9am -5 pm, Mon-Fri)

Emergency telephone numbers (24 Hours)

Australia: 1800 127 406
Poison Information Centre Tel 13 11 26

New Zealand 0800 243622
+64 4917 9888 (If calling from outside of NZ)
NZ Poisons Centre : 0800 764 766

Recommended use of the chemical and restrictions on use

Recommended use : Vehicle care – wax

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	Dark purple
Odour	characteristic

Classification

Classification according to the Globally Harmonised System for the Classification and Labelling of Chemicals (GHS), as adopted for industrial chemicals in Australia.

This product is Hazardous according to the Hazardous Substances (Classification) Regulations 2001.

	GHS	HSNO
Skin corrosion	: Category 1B	8.2B
Serious Eye Damage	: Category 1	8.3A
Aquatic Acute	: Category 1	9.1A

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

Print Date 29/11/2016

GHS label elements

Hazard pictograms



Signal word : Danger

Hazard statements : H314 Causes severe skin burns and eye damage.
: H400 Very toxic to aquatic life

Precautionary statements

Prevention:

P264 Wash skin thoroughly after handling.

P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response:

P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.

P304 + P340 + P310 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.

P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with

water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER/doctor.

P363 Wash contaminated clothing before reuse.

Storage:

P405 Store locked up..

Disposal:

Dispose of contents/container in accordance with local regulation.

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

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Australian Dangerous Goods Code and New Zealand NZS 5433:2007:

UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (QUATERNARY AMMONIUM COMPOUNDS), 9, III

Note: Australian Special Provision: AU01

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical name	CAS-No.	Concentration [%]
dodecyldimethylamine oxide	1643-20-5	>= 10 - < 20
Quaternary ammonium compounds, dicoco alkyldimethyl, chlorides	61789-77-3	>= 1 - < 5
acetic acid	64-19-7	>= 1 - < 5
Amines, tallow alkyl, ethoxylated	61791-26-2	>= 1 - < 5
propan-2-ol	67-63-0	>= 1 - < 5

The exact percentages of disclosed substances are withheld as trade secrets

SECTION 4. FIRST AID MEASURES

- General advice : Move out of dangerous area.
Consult a physician.
Show this safety data sheet to the doctor in attendance.
Do not leave the victim unattended.
- If inhaled : Move to fresh air. If unconscious place in recovery position and seek medical advice. If symptoms persist, call a physician.
- In case of skin contact : If skin irritation persists, call a physician.
In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get immediate medical attention while applying and massaging in 2.5% calcium gluconate gel. Wash clothing before reuse. Clean shoes thoroughly before reuse. Get immediate medical attention. If on skin, rinse well with water. If on clothes, remove clothes.
- In case of eye contact : Small amounts splashed into eyes can cause irreversible tissue damage and blindness.
In the case of contact with eyes, rinse immediately with plenty of water and seek medical advice.
Continue rinsing eyes during transport to hospital.
Remove contact lenses.
Protect unharmed eye.
Keep eye wide open while rinsing.
If eye irritation persists, consult a specialist.

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

Print Date 29/11/2016

- | | |
|--------------|--|
| If swallowed | : Clean mouth with water and drink afterwards plenty of water.
Keep respiratory tract clear.
Do NOT induce vomiting.
Do not give milk or alcoholic beverages.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician.
Take victim immediately to hospital. |
|--------------|--|

SECTION 5. FIREFIGHTING MEASURES

- | | |
|---|---|
| Suitable extinguishing media | : Dry chemical
Alcohol-resistant Foam
Carbon dioxide (CO2)
Water spray |
| Unsuitable extinguishing media | : High volume water jet |
| Specific hazards during firefighting | : Do not allow run-off from fire fighting to enter drains or water courses. |
| Hazardous combustion products | : Carbon dioxide (CO2)
Carbon monoxide
Smoke
Nitrogen oxides (NOx) |
| Specific extinguishing methods | : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment. |
| Further information | : Collect contaminated fire extinguishing water separately. This must not be discharged into drains.
Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations.
For safety reasons in case of fire, cans should be stored separately in closed containments.
Use a water spray to cool fully closed containers. |
| Special protective equipment for firefighters | : Wear self-contained breathing apparatus for firefighting if necessary. |

SECTION 6. ACCIDENTAL RELEASE MEASURES

- | | |
|---|---|
| Personal precautions, protective equipment and emergency procedures | : Use appropriate personal protective equipment.
Ensure adequate ventilation. |
| Environmental precautions | : Prevent product from entering drains.
Prevent further leakage or spillage if safe to do so.
If the product contaminates rivers and lakes or drains inform respective authorities. |

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

Print Date 29/11/2016

Methods and materials for containment and cleaning up : Contain spillage, Neutralize with chalk, alkali solution or ammonia and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13).

SECTION 7. HANDLING AND STORAGE

Advice on safe handling : Avoid formation of aerosol.
Do not breathe vapours/dust.
Avoid contact with skin and eyes.
For personal protection see section 8.
Smoking, eating and drinking should be prohibited in the application area.
Provide sufficient air exchange and/or exhaust in work rooms.
To avoid spills during handling keep bottle on a metal tray.
Dispose of rinse water in accordance with local and national regulations.

Conditions for safe storage : No smoking. Keep container tightly closed in a dry and ventilated place.
Containers which are opened must be carefully resealed and kept upright to prevent leakage.
Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.

Materials to avoid : Keep away from oxidizing agents and strongly acid or alkaline materials.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Acetic acid	64-19-7	TWA	10 ppm	ACGIH
		STEL	15 ppm	ACGIH
		ST	15 ppm 37 mg/m3	NIOSH REL

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

Print Date 29/11/2016

Components	CAS-No.	Value type	Control	Basis
		TWA	10 ppm 25 mg/m3	NIOSH REL
		TWA	10 ppm 25 mg/m3	OSHA Z-1
		TWA	10 ppm 25 mg/m3	OSHA P0
		TWA STEL	10 ppm 25 mg/m3 15 ppm 37 mg/m3	AUS SWA
		TWA	10 ppm 25 mg/m3 15 ppm 37 mg/m3	NZ WES
propan-2-ol	67-63-0	TWA	200 ppm	ACGIH
		STEL	400 ppm	ACGIH
		TWA	400 ppm 980 mg/m3	NIOSH REL
		ST	500 ppm 1,225 mg/m3	NIOSH REL
		TWA	400 ppm 980 mg/m3	OSHA Z-1
		TWA	400 ppm 980 mg/m3	OSHA P0
		STEL	500 ppm 1,225 mg/m3	OSHA P0
		PEL	400 ppm 980 mg/m3	CAL PEL
		STEL	500 ppm 1,225 mg/m3	CAL PEL
		TWA STEL	400 ppm 983 mg/m3 500 ppm 1,230 mg/m3	AUS SWA
		TWA STEL	400 ppm 983 mg/m3 500 ppm 1,230 mg/m3	NZ WES

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

Version 1.0

Revision Date 29/11/2016

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Engineering measures	: effective ventilation in all processing areas
Personal protective equipment	
Respiratory protection	: In the case of vapour formation use a respirator with an approved filter.
Hand protection	
Remarks	: The suitability for a specific workplace should be discussed with the producers of the protective gloves.
Eye protection	: Eye wash bottle with pure water Tightly fitting safety goggles Wear face-shield and protective suit for abnormal processing problems.
Skin and body protection	: Impervious clothing Choose body protection according to the amount and concentration of the dangerous substance at the work place.
Protective measures	: Wear suitable protective equipment. Avoid contact with skin. When using do not eat, drink or smoke.
Hygiene measures	: When using do not eat or drink. When using do not smoke. Wash hands before breaks and at the end of workday.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	: liquid
Colour	: dark purple
Odour	: characteristic
Odour Threshold	: No data available
pH	: 5-6
Melting point/freezing point	: No data available
Boiling point	: > 100 °C
Flash point	: 66 °C Method: closed cup
Evaporation rate	: No data available
Upper explosion limit	: No data available
Lower explosion limit	: No data available
Vapour pressure	: No data available
Relative vapour density	: No data available
Relative density	: No data available

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AAP EXTREME SHINE WAX 5GL (18.9L)

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Density	: 0.940 g/cm ³
Solubility(ies)	
Water solubility	: Soluble
Solubility in other solvents	: Not applicable
Partition coefficient: n-octanol/water	: No data available
Auto-ignition temperature	: not determined
Thermal decomposition	: No data available

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: Stable
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No decomposition if stored and applied as directed.
Conditions to avoid	: no data available.
Incompatible materials	: Oxidizing agents
Hazardous decomposition products	: Carbon dioxide (CO ₂) Carbon monoxide

SECTION 11. TOXICOLOGICAL INFORMATION

Potential Health Effects

Acute toxicity

Product:

Acute oral toxicity : Acute toxicity estimate : >5000 mg/kg
Method: Calculation method

Acute inhalation toxicity : Acute toxicity estimate : > 40 mg/l
Exposure time: 4 h
Test atmosphere: vapour
Method: Calculation method

Components:**propan-2-ol:**

Acute oral toxicity : LD50 Oral Rat: 4,396 mg/kg
Method: Calculation method

Acetic acid:

Acute oral toxicity : LD50 Oral Rat: 3,310 mg/kg

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

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Skin corrosion/irritation

Product:

Remarks: Extremely corrosive and destructive to tissue.

Serious eye damage/eye irritation

Product:

Remarks: May cause irreversible eye damage.

Respiratory or skin sensitisation

No data available

Germ cell mutagenicity

No data available

Carcinogenicity

No data available

Reproductive toxicity

No data available

dodecyltrimethylamine oxide:

Quaternary ammonium compounds, dicoco alkyldimethyl, chlorides:

acetic acid:

Amines, tallow alkyl, ethoxylated:

propan-2-ol:

STOT - single exposure

No data available

STOT - repeated exposure

No data available

Aspiration toxicity

No data available

Further information

Product:

Remarks: no data available

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

No data available

Persistence and degradability

No data available

Bioaccumulative potential

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

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Product:

Partition coefficient: n-octanol/water : Remarks: No data available

Mobility in soil

No data available

Other adverse effects

No data available

Product:

Additional ecological : No data available.

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : The product should not be allowed to enter drains, water courses or the soil.
Do not contaminate ponds, waterways or ditches with chemical or used container.
Dispose of in accordance with local regulations.

Contaminated packaging : Empty remaining contents.
Dispose of as unused product.
Do not re-use empty containers.
Do not burn, or use a cutting torch on, the empty drum.

SECTION 14. TRANSPORT INFORMATION

Transportation Regulation: Australian Dangerous Goods Code and New Zealand NZS 5433:2007: UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (QUATERNARY

AMMONIUM COMPOUNDS), 9, III

Australian Special Provision: AU01 Environmentally Hazardous Substances meeting the descriptions of UN 3077 or UN 3082 are not subject to this Code when transported by road or rail in;

(a) packagings that do not incorporate a receptacle exceeding 500 kg(L); or

(b) IBCs.

Transportation Regulation: IMDG (Vessel):

UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (QUATERNARYAMMONIUM COMPOUNDS), 9, III I
MARINE POLLUTANT

Transportation Regulation: IATA (Cargo Air):

UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (QUATERNARYAMMONIUM COMPOUNDS), 9, III

SAFETY DATA SHEET



AAP EXTREME SHINE WAX 5GL (18.9L)

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Transportation Regulation: IATA (Passenger Air):

UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S.,
(QUATERNARYAMMONIUM COMPOUNDS), 9, III

The product as delivered to the customer conforms to packaging requirements for shipment by road under US Department of Transportation (DOT) regulations. Additional transportation classifications noted above are for reference only, and not a certification or warranty of the suitability of the packaging for shipment under these alternative transport regulations.

SECTION 15. REGULATORY INFORMATION

The components of this product are reported in the following inventories:

USA	On TSCA Inventory
Canada	This product contains the following components listed on the Canadian NDSL. All other components are on the Canadian DSL.
Australia	on AICS Inventory
New Zealand	on NZIoC
	Group Standard Approval: Cleaning Products (Subsidiary Hazard)
	Group Standard HSR002530

For information on the country notification status for other regions please contact the manufacturer's regulatory group.

SECTION 16. OTHER INFORMATION

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind. The information in this document applies to this specific material as supplied. It may not be valid for this material if it is used in combination with any other materials. Users should make their own investigations to determine the suitability and applicability of the information for their particular purposes. This SDS has been prepared by the Compliance Services organization supporting this manufacturer, supplier or distributor.

**Cover Sheet for Safety Data Sheet****1. Identification of the Substance/Preparation and of the Company/Undertaking**

Product Name **AAP VELOCITY CLEAR COAT PROTECT 5GL**

Overseas Supplier Zep Inc

NZ Distributor Velocity Vehicle Care NZ Ltd
Level 4
3 London St, Hamilton, 3240
Phone: 0800 4 83562 (0800 4 VELOC)
Fax: 07 974 9540
Email: orders@velocityvehiclecare.com

Emergency Number **New Zealand: 0800 243 622**

This product is Hazardous according to the NZ Hazardous Substances (Classification) Regulations 2001.

Australian Distributor Velocity Vehicle Care Pty Ltd
27-33 Tottenham Pde, Tottenham VIC 3012
Ph: 1300 990 074
Fax: 03 8669 4179
Email: orders@velocityvehiclecare.com

Emergency Number **Australia: 1800 127 406**

This product is Hazardous according to the Approved Criteria for Classifying Hazardous Substances [NOHSC:1008 (2004)]

Cover Sheet prepared 12 Nov 2015 by Responsible Care NZ.

SAFETY DATA SHEET



AAP VELOCITY CLEAR COAT PROTECT 5GL

Version 1.5

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Print Date 11/14/2016

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : AAP VELOCITY CLEAR COAT PROTECT 5GL

Material number : 000000000030001895

Manufacturer or supplier's details

Company : Zep Inc.

Address : 1310 Seaboard Industrial Blvd., NW
Atlanta, GA 30318

Telephone : 404-352-1680

Emergency telephone numbers**For SDS Information** : Compliance Services 1-877-428-9937**For a Medical Emergency** : 877-541-2016 Toll Free - All Calls Recorded**For a Transportation Emergency** : CHEMTREC: 800-424-9300 - All Calls Recorded.
In the District of Columbia 202-483-7616**Recommended use of the chemical and restrictions on use**

Recommended use : Protective Coating

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	brown
Odour	characteristic

GHS Classification

Flammable liquids : Category 4
 Acute toxicity (Oral) : Category 4
 Skin corrosion : Category 1B
 Serious eye damage : Category 1
 Aspiration hazard : Category 1

GHS label elements

Hazard pictograms :



Signal word : Danger

Hazard statements : H227 Combustible liquid.
 H302 Harmful if swallowed.
 H304 May be fatal if swallowed and enters airways.
 H314 Causes severe skin burns and eye damage.

Precautionary statements : **Prevention:**
 P210 Keep away from heat/sparks/open flames/hot surfaces.

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No smoking.

P264 Wash skin thoroughly after handling.

P270 Do not eat, drink or smoke when using this product.

P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response:

P301 + P310 IF SWALLOWED: Immediately call a POISON CENTER/doctor.

P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.

P304 + P340 + P310 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.

Immediately call a POISON CENTER or doctor/ physician.

P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER/doctor.

P363 Wash contaminated clothing before reuse.

P370 + P378 In case of fire: Use dry sand, dry chemical or alcohol-resistant foam for extinction.

Storage:

P403 + P235 Store in a well-ventilated place. Keep cool.

P405 Store locked up.

Disposal:

Dispose of contents/container in accordance with local regulation.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical name	CAS-No.	Concentration [%]
Distillates (petroleum), hydrotreated middle	64742-46-7	>= 10 - < 20
Quaternary ammonium compounds, dicoco alkyldimethyl, chlorides	61789-77-3	>= 5 - < 10
2-butoxyethanol	111-76-2	>= 5 - < 10
Amines, C14-18 and C16-18-unsatd. alkyl, ethoxylated	68155-39-5	>= 1 - < 5
propan-2-ol	67-63-0	>= 1 - < 5

The exact percentages of disclosed substances are withheld as trade secrets.

SECTION 4. FIRST AID MEASURES

General advice : Move out of dangerous area.
 Consult a physician.
 Show this safety data sheet to the doctor in attendance.
 Symptoms of poisoning may appear several hours later.
 Do not leave the victim unattended.

If inhaled : If unconscious place in recovery position and seek medical

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- advice.
If symptoms persist, call a physician.
- In case of skin contact : Immediate medical treatment is necessary as untreated wounds from corrosion of the skin heal slowly and with difficulty.
If on skin, rinse well with water.
If on clothes, remove clothes.
- In case of eye contact : Small amounts splashed into eyes can cause irreversible tissue damage and blindness.
In the case of contact with eyes, rinse immediately with plenty of water and seek medical advice.
Continue rinsing eyes during transport to hospital.
Remove contact lenses.
Protect unharmed eye.
Keep eye wide open while rinsing.
If eye irritation persists, consult a specialist.
- If swallowed : Keep respiratory tract clear.
Do NOT induce vomiting.
Do not give milk or alcoholic beverages.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician.
Take victim immediately to hospital.

SECTION 5. FIREFIGHTING MEASURES

- Suitable extinguishing media : Dry chemical
Foam
Carbon dioxide (CO2)
Water spray
- Unsuitable extinguishing media : High volume water jet
- Specific hazards during firefighting : Do not allow run-off from fire fighting to enter drains or water courses.
- Hazardous combustion products : Carbon dioxide (CO2)
Carbon monoxide
Smoke
Nitrogen oxides (NOx)
- Specific extinguishing methods : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
- Further information : Collect contaminated fire extinguishing water separately. This must not be discharged into drains.
Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations.
For safety reasons in case of fire, cans should be stored separately in closed containments.
Use a water spray to cool fully closed containers.
- Special protective equipment for firefighters : Wear self-contained breathing apparatus for firefighting if necessary.

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SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions, protective equipment and emergency procedures : Use personal protective equipment.
Ensure adequate ventilation.
- Environmental precautions : Prevent product from entering drains.
Prevent further leakage or spillage if safe to do so.
If the product contaminates rivers and lakes or drains inform respective authorities.
- Methods and materials for containment and cleaning up : Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13).
Keep in suitable, closed containers for disposal.

SECTION 7. HANDLING AND STORAGE

- Advice on safe handling : Avoid formation of aerosol.
Do not breathe vapours/dust.
Avoid contact with skin and eyes.
For personal protection see section 8.
Smoking, eating and drinking should be prohibited in the application area.
Provide sufficient air exchange and/or exhaust in work rooms.
To avoid spills during handling keep bottle on a metal tray.
Dispose of rinse water in accordance with local and national regulations.
- Conditions for safe storage : No smoking.
Keep container tightly closed in a dry and well-ventilated place.
Containers which are opened must be carefully resealed and kept upright to prevent leakage.
Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.
- Materials to avoid : Keep away from oxidizing agents and strongly acid or alkaline materials.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
2-butoxyethanol	111-76-2	TWA	20 ppm	ACGIH
		TWA	5 ppm	NIOSH REL

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			24 mg/m3	
		TWA	50 ppm 240 mg/m3	OSHA Z-1
		TWA	25 ppm 120 mg/m3	OSHA P0
		PEL	20 ppm 97 mg/m3	CAL PEL
propan-2-ol	67-63-0	TWA	200 ppm	ACGIH
		STEL	400 ppm	ACGIH
		TWA	400 ppm 980 mg/m3	NIOSH REL
		ST	500 ppm 1,225 mg/m3	NIOSH REL
		TWA	400 ppm 980 mg/m3	OSHA Z-1
		TWA	400 ppm 980 mg/m3	OSHA P0
		STEL	500 ppm 1,225 mg/m3	OSHA P0
		PEL	400 ppm 980 mg/m3	CAL PEL
		STEL	500 ppm 1,225 mg/m3	CAL PEL

Biological occupational exposure limits

Component	CAS-No.	Control parameters	Biological specimen	Sampling time	Permissible concentration	Basis
2-BUTOXYETHANOL	111-76-2	Butoxyacetic acid (BAA)	Urine	End of shift (As soon as possible after exposure ceases)	200 mg/g Creatinine	ACGIH BEI
PROPAN-2-OL	67-63-0	Acetone	Urine	End of shift at end of workweek	40 mg/l	ACGIH BEI

Engineering measures : effective ventilation in all processing areas

Personal protective equipment

Respiratory protection : In the case of vapour formation use a respirator with an approved filter.

Hand protection
Remarks : The suitability for a specific workplace should be discussed with the producers of the protective gloves.

Eye protection : Eye wash bottle with pure water
Tightly fitting safety goggles
Wear face-shield and protective suit for abnormal processing problems.

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- | | | |
|--------------------------|---|---|
| Skin and body protection | : | Impervious clothing
Choose body protection according to the amount and concentration of the dangerous substance at the work place. |
| Protective measures | : | Wear suitable protective equipment.
Avoid contact with skin.
When using do not eat, drink or smoke. |
| Hygiene measures | : | When using do not eat or drink.
When using do not smoke.
Wash hands before breaks and at the end of workday. |

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

- | | | |
|--|---|-----------------------------|
| Appearance | : | liquid |
| Colour | : | brown |
| Odour | : | characteristic |
| Odour Threshold | : | No data available |
| pH | : | 7.5 - 9.5 |
| Melting point/freezing point | : | No data available |
| Boiling point | : | > 100 °C |
| Flash point | : | 66 °C
Method: closed cup |
| Evaporation rate | : | No data available |
| Upper explosion limit | : | No data available |
| Lower explosion limit | : | No data available |
| Vapour pressure | : | No data available |
| Relative vapour density | : | No data available |
| Relative density | : | 0.96 |
| Density | : | No data available |
| Solubility(ies) | : | |
| Water solubility | : | No data available |
| Solubility in other solvents | : | Not applicable |
| Partition coefficient: n-octanol/water | : | No data available |
| Auto-ignition temperature | : | not determined |
| Thermal decomposition | : | No data available |

SECTION 10. STABILITY AND REACTIVITY

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Reactivity	: Stable
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No decomposition if stored and applied as directed.
Conditions to avoid	: Heat, flames and sparks.
Incompatible materials	: Oxidizing agents
Hazardous decomposition products	: Carbon dioxide (CO ₂) Carbon monoxide

SECTION 11. TOXICOLOGICAL INFORMATION

Potential Health Effects

Carcinogenicity:

IARC	No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.
ACGIH	Confirmed animal carcinogen with unknown relevance to humans 2-butoxyethanol 111-76-2
OSHA	No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.
NTP	No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

Acute toxicity

Product:

Acute oral toxicity	: Acute toxicity estimate : 1,398 mg/kg Method: Calculation method
Acute inhalation toxicity	: Acute toxicity estimate : > 40 mg/l Exposure time: 4 h Test atmosphere: vapour Method: Calculation method
Acute dermal toxicity	: Acute toxicity estimate : > 5,000 mg/kg Method: Calculation method

Components:

propan-2-ol:	
Acute oral toxicity	: LD50 Oral Rat: 4,396 mg/kg Method: Calculation method

Skin corrosion/irritation

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Product:

Remarks: Extremely corrosive and destructive to tissue.

Serious eye damage/eye irritation**Product:**

Remarks: May cause irreversible eye damage.

Respiratory or skin sensitisation

No data available

Germ cell mutagenicity

No data available

Carcinogenicity

No data available

Reproductive toxicity

No data available

Distillates (petroleum), hydrotreated middle:
Quaternary ammonium compounds, dicoco alkyl dimethyl, chlorides:
2-butoxyethanol:
Amines, C14-18 and C16-18-unsatd. alkyl, ethoxylated:
propan-2-ol:

STOT - single exposure

No data available

STOT - repeated exposure

No data available

Aspiration toxicity

No data available

Further information**Product:**

Remarks: Solvents may degrease the skin.

SECTION 12. ECOLOGICAL INFORMATION**Ecotoxicity**

No data available

Persistence and degradability

No data available

Bioaccumulative potential**Product:**

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Partition coefficient: n-octanol/water : Remarks: No data available

Mobility in soil

No data available

Other adverse effects

No data available

Product:**Regulation**

40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances

Remarks

This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

Additional ecological information

: An environmental hazard cannot be excluded in the event of unprofessional handling or disposal., Toxic to aquatic life.

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods**Waste from residues**

: The product should not be allowed to enter drains, water courses or the soil.
Do not contaminate ponds, waterways or ditches with chemical or used container.
Dispose of in accordance with local regulations.

Contaminated packaging

: Empty remaining contents.
Dispose of as unused product.
Do not re-use empty containers.
Do not burn, or use a cutting torch on, the empty drum.

SECTION 14. TRANSPORT INFORMATION

Transportation Regulation: 49 CFR (USA):
NOT REGULATED AS DANGEROUS GOODS OR HAZARDOUS MATERIAL

Transportation Regulation: IMDG (Vessel):
UN3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (MIXED QUATERNARY AMMONIUM COMPOUNDS), 9, III

Transportation Regulation: IATA (Cargo Air):
UN3082, Environmentally hazardous substance, liquid, n.o.s., (MIXED QUATERNARY AMMONIUM COMPOUNDS), 9, III

Transportation Regulation: IATA (Passenger Air):

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AAP VELOCITY CLEAR COAT PROTECT 5GL

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Print Date 11/14/2016

UN3082, Environmentally hazardous substance, liquid, n.o.s., (MIXED QUATERNARY AMMONIUM COMPOUNDS), 9, III

Transportation Regulation: TDG (Canada):
NOT REGULATED AS DANGEROUS GOODS OR HAZARDOUS MATERIAL

The product as delivered to the customer conforms to packaging requirements for shipment by road under US Department of Transportation (DOT) regulations. Additional transportation classifications noted above are for reference only, and not a certification or warranty of the suitability of the packaging for shipment under these alternative transport regulations.

SECTION 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
chloromethane	74-87-3	100	*

*: Calculated RQ exceeds reasonably attainable upper limit.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Fire Hazard
Acute Health Hazard

SARA 302 : No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Prop 65

WARNING! This product contains a chemical known to the State of California to cause cancer.
1,4-dioxane 123-91-1
WARNING: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.
chloromethane 74-87-3

The components of this product are reported in the following inventories:

TSCA On TSCA Inventory
DSL This product contains the following components listed on the Canadian NDCL. All other components are on the Canadian DSL.

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AAP VELOCITY CLEAR COAT PROTECT 5GL

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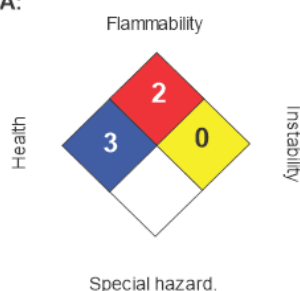
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For information on the country notification status for other regions please contact the manufacturer's regulatory group.

Inventory Acronym and Validity Area Legend:

TSCA (USA), DSL (Canada), NDSL (Canada)

SECTION 16. OTHER INFORMATION**Further information****NFPA:****HMIS III:**

HEALTH	3
FLAMMABILITY	2
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

OSHA - GHS Label Information:

Hazard pictograms



Signal word

Danger:

Hazard statements

Combustible liquid. Harmful if sw allowed. May be fatal if sw allowed and enters airways.
Causes severe skin burns and eye damage.

Precautionary statements

Prevention: Keep away from heat/sparks/open flames/hot surfaces. No smoking. Wash skin thoroughly after handling. Do not eat, drink or smoke when using this product. Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response: IF SWALLOWED: Immediately call a POISON CENTER/doctor. IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/shower. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER/doctor. Wash contaminated clothing before reuse. In case of fire: Use dry sand, dry chemical or alcohol-resistant foam for extinction.
Storage: Store in a well-ventilated place. Keep cool. Store locked up.
Disposal: Dispose of contents/container in accordance with local regulation.

Version:	1.5
Revision Date:	10/11/2016
Print Date:	11/14/2016

SAFETY DATA SHEET

**AAP VELOCITY CLEAR COAT PROTECT 5GL**

Version 1.5

Revision Date 10/11/2016

Print Date 11/14/2016

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind. The information in this document applies to this specific material as supplied. It may not be valid for this material if it is used in combination with any other materials. Users should make their own investigations to determine the suitability and applicability of the information for their particular purposes.

This SDS has been prepared by the Compliance Services organization supporting this manufacturer, supplier or distributor.

Zep Inc. markets products under well recognized and established brand names such as Zep®, Zep Commercial®, Zep Professional®, Enforcer®, National Chemical™, Selig™, Misty®, Next Dimension™, Petro®, i-Chem®, TimeMist®, TimeWick™, MicrobeMax®, Country Vet®, Konk®, Original Bike Spirits®, Blue Coral®, Black Magic®, Rain-X®, Niagara National™, F C Forward Chemicals®, Rexodan®, Mykal™, and a number of private labeled brands.

**Cover Sheet for Safety Data Sheet****1. Identification of the Substance/Preparation and of the Company/Undertaking**

Product Name **BLUE CORAL HI PH 3688 5GAL**

Overseas Supplier Zep Inc

NZ Distributor Velocity Vehicle Care NZ Ltd
Level 4
3 London St, Hamilton, 3240
Phone: 0800 4 83562 (0800 4 VELOC)
Fax: 07 974 9540
Email: orders@velocityvehiclecare.com

Emergency Number **New Zealand: 0800 243 622**

This product is Hazardous according to the NZ Hazardous Substances (Classification) Regulations 2001.

Australian Distributor Velocity Vehicle Care Pty Ltd
27-33 Tottenham Pde, Tottenham, VIC, 3012
Ph: 1300 990 074
Fax: 03 8669 4179
Email: orders@velocityvehiclecare.com

Emergency Number **Australia: 1800 127 406**

This product is Hazardous according to the Approved Criteria for Classifying Hazardous Substances [NOHSC:1008 (2004)]

Cover Sheet prepared 1st Nov 2016 by Velocity Vehicle Care

SAFETY DATA SHEET



BCL HI PH 3688 5GL

Version 1.1

Revision Date 05/22/2015

Print Date 11/14/2016

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : BCL HI PH 3688 5GL

Material number : 000000000030003495

Manufacturer or supplier's details

Company : Zep Inc.

Address : 1310 Seaboard Industrial Blvd., NW
Atlanta, GA 30318

Telephone : 404-352-1680

Emergency telephone numbers**For SDS Information** : Compliance Services 1-877-428-9937**For a Medical Emergency** : 877-541-2016 Toll Free - All Calls Recorded**For a Transportation Emergency** : CHEMTREC: 800-424-9300 - All Calls Recorded.
In the District of Columbia 202-483-7616

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	colourless
Odour	mild

GHS Classification

Skin corrosion : Category 1A

Serious eye damage : Category 1

GHS Label element

Hazard pictograms :



Signal word : Danger

Hazard statements : H314 Causes severe skin burns and eye damage.

Precautionary statements : **Prevention:**
 P264 Wash skin thoroughly after handling.
 P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response:
 P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
 P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.
 P304 + P340 + P310 IF INHALED: Remove victim to fresh air

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and keep at rest in a position comfortable for breathing.
 Immediately call a POISON CENTER or doctor/ physician.
 P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
 P363 Wash contaminated clothing before reuse.
Storage:
 P405 Store locked up.
Disposal:
 P501 Dispose of contents/container in accordance with local regulation.

Potential Health Effects

Carcinogenicity:

IARC

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

ACGIH

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by ACGIH.

OSHA

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical Name	CAS-No.	Concentration [%]
sodium hydroxide	1310-73-2	>= 20 - < 30
disodium decyl(sulphonatophenoxy)benzenesulphonate	36445-71-3	>= 1 - < 5

SECTION 4. FIRST AID MEASURES

General advice : Move out of dangerous area.
 Consult a physician.
 Show this safety data sheet to the doctor in attendance.
 Do not leave the victim unattended.

If inhaled : If unconscious place in recovery position and seek medical advice.
 If symptoms persist, call a physician.

In case of skin contact : Immediate medical treatment is necessary as untreated wounds from corrosion of the skin heal slowly and with difficulty.

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- If on skin, rinse well with water.
If on clothes, remove clothes.
- In case of eye contact : Small amounts splashed into eyes can cause irreversible tissue damage and blindness.
In the case of contact with eyes, rinse immediately with plenty of water and seek medical advice.
Continue rinsing eyes during transport to hospital.
Remove contact lenses.
Protect unharmed eye.
Keep eye wide open while rinsing.
If eye irritation persists, consult a specialist.
- If swallowed : Keep respiratory tract clear.
Do NOT induce vomiting.
Do not give milk or alcoholic beverages.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician.
Take victim immediately to hospital.

SECTION 5. FIREFIGHTING MEASURES

- Suitable extinguishing media : Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.
- Unsuitable extinguishing media : High volume water jet
- Specific hazards during firefighting : Do not allow run-off from fire fighting to enter drains or water courses.
- Hazardous combustion products : Carbon dioxide (CO₂)
Carbon monoxide
Smoke
Sulphur oxides
- Specific extinguishing methods :
- Further information : Collect contaminated fire extinguishing water separately. This must not be discharged into drains.
Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations.
- Special protective equipment for firefighters : Wear self-contained breathing apparatus for firefighting if necessary.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions, protective equipment and emergency procedures : Use personal protective equipment.
- Environmental precautions : Prevent product from entering drains.
Prevent further leakage or spillage if safe to do so.
If the product contaminates rivers and lakes or drains inform respective authorities.

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Methods and materials for containment and cleaning up : Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust).
Keep in suitable, closed containers for disposal.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling : Do not breathe vapours/dust.
Avoid contact with skin and eyes.
For personal protection see section 8.
Smoking, eating and drinking should be prohibited in the application area.
To avoid spills during handling keep bottle on a metal tray.
Dispose of rinse water in accordance with local and national regulations.

Conditions for safe storage : Keep container tightly closed in a dry and well-ventilated place.
Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.

Materials to avoid : Store and keep away from, oxidizing agents and acids.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
sodium hydroxide	1310-73-2	C	2 mg/m3	ACGIH
		C	2 mg/m3	NIOSH REL
		TWA	2 mg/m3	OSHA Z-1
		C	2 mg/m3	OSHA P0

Personal protective equipment

Respiratory protection : No personal respiratory protective equipment normally required.

Hand protection : The suitability for a specific workplace should be discussed with the producers of the protective gloves.

Eye protection : Eye wash bottle with pure water
Tightly fitting safety goggles
Wear face-shield and protective suit for abnormal processing problems.

Skin and body protection : impervious clothing
Choose body protection according to the amount and

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concentration of the dangerous substance at the work place.

Protective measures : Wear suitable protective equipment.
 Avoid contact with skin.
 When using do not eat, drink or smoke.

Hygiene measures : When using do not eat or drink.
 When using do not smoke.
 Wash hands before breaks and at the end of workday.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance : liquid

Colour : colourless

Odour : mild

Odour Threshold : no data available

pH : 13 - 14

Melting point/freezing point : no data available

Boiling point : > 100 °C

Flash point :
 does not flash

Evaporation rate : no data available

Upper explosion limit : no data available

Lower explosion limit : no data available

Vapour pressure : no data available

Relative vapour density : no data available

Density : 1.30 - 1.34 g/cm³

Solubility(ies)

Water solubility : soluble

Solubility in other solvents : not determined

Partition coefficient: n-octanol/water : no data available

Auto-ignition temperature : not determined

Thermal decomposition : no data available

Viscosity

Viscosity, kinematic : no data available

SECTION 10. STABILITY AND REACTIVITY

Reactivity : Stable

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Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No decomposition if stored and applied as directed.
Conditions to avoid	: no data available
Incompatible materials	: Metals Acids
Hazardous decomposition products	: No decomposition if stored and applied as directed.

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Product:

Acute oral toxicity : Acute toxicity estimate : > 5,000 mg/kg
Method: Calculation method

Components:sodium hydroxide:

Acute dermal toxicity : Acute toxicity estimate rabbit: 1,350 mg/kg

Skin corrosion/irritation

Product:

Remarks: Extremely corrosive and destructive to tissue.

Serious eye damage/eye irritation

Product:

Remarks: May cause irreversible eye damage.

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

sodium hydroxide:

disodium decyl(sulphonatophenoxy)benzenesulphonate:

STOT - single exposure

no data available

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STOT - repeated exposure

no data available

Aspiration toxicity

no data available

Further information**Product:**

Remarks: no data available

SECTION 12. ECOLOGICAL INFORMATION**Ecotoxicity**

no data available

Persistence and degradability

no data available

Bioaccumulative potential**Product:**

Partition coefficient: n-octanol/water : Remarks: no data available

Mobility in soil

no data available

Other adverse effects

no data available

Product:

Regulation 40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances

Remarks This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

Additional ecological information : no data available

SECTION 13. DISPOSAL CONSIDERATIONS**Disposal methods**

Waste from residues : Dispose of wastes in an approved waste disposal facility.

Do not dispose of waste into sewer.

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Do not contaminate ponds, waterways or ditches with chemical or used container.

Contaminated packaging : Empty remaining contents.
Dispose of as unused product.
Do not re-use empty containers.

SECTION 14. TRANSPORT INFORMATION

Transportation Regulation: 49 CFR (USA):
UN1824, Sodium hydroxide solution, 8, II

Transportation Regulation: IMDG (Vessel):
UN1824, SODIUM HYDROXIDE SOLUTION, 8, II

Transportation Regulation: IATA (Cargo Air):
UN1824, Sodium hydroxide solution, 8, II

Transportation Regulation: IATA (Passenger Air):
UN1824, Sodium hydroxide solution, 8, II

Transportation Regulation: TDG (Canada):
UN1824, SODIUM HYDROXIDE SOLUTION, 8, II

SECTION 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
sodium hydroxide	1310-73-2	1000	4560

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Acute Health Hazard
Acute Health Hazard

SARA 302 : SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Prop 65 This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other

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reproductive harm.

The components of this product are reported in the following inventories:

TSCA	On the inventory, or in compliance with the inventory
DSL	This product contains one or several components that are not on the Canadian DSL nor NDSL.
AICS	Not in compliance with the inventory
NZIoC	Not in compliance with the inventory
PICCS	Not in compliance with the inventory
IECSC	Not in compliance with the inventory

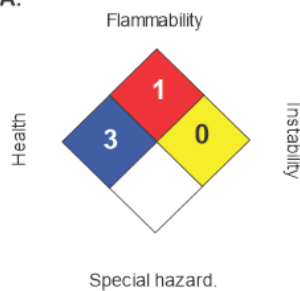
Inventory Acronym and Validity Area Legend:

AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TSCA (USA)

SECTION 16. OTHER INFORMATION

Further information

NFPA:



HMIS III:

HEALTH	3
FLAMMABILITY	0
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

OSHA GHS Label Information:

Hazard pictograms



Signal word

Hazard statements

Precautionary statements

Danger:

Causes severe skin burns and eye damage.

Prevention: Wash skin thoroughly after handling. Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician. Wash contaminated clothing before reuse.

Storage: Store locked up.

Disposal: Dispose of contents/container in accordance with local regulation.

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Zep Inc. markets products under well recognized and established brand names such as Zep®, Zep Commercial®, Zep Professional®, Enforcer®, National Chemical™, Selig™, Misty®, Next Dimension™, Petro®, i-Chem®, TimeMist®, TimeWick™, MicrobeMax®, Country Vet®, Konk®, Original Bike Spirits®, Blue Coral®, Black Magic®, Rain-X®, Niagara National™, FC Forward Chemicals®, Rexodan®, Mykal™, and a number of private labeled brands.



SAFETY DATA SHEET

BLUE CORAL HI PH 3692

Section: 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : BLUE CORAL HI PH 3692

Other means of identification : Not applicable.

Recommended use : Presoak

Product dilution information : 0.2 % - 1.7 %

Company : VELOCITY VEHICLE CARE PTY LTD
 27-33 Tottenham Pde,
 Tottenham, VIC, Australia, 3012
 1300 990 074

Emergency telephone : 1800 127 406 Australia
 number : 0800 243 622 New Zealand

Issuing date : 17.06.2016

Section: 2. HAZARDS IDENTIFICATION

GHS Classification

Product AS SOLD

Corrosive to metals : Category 1
 Skin corrosion/irritation : Category 1
 Serious eye damage/eye irritation : Category 1

Product AT USE DILUTION

Not a hazardous substance or mixture.

GHS Label element

Product AS SOLD

Hazard pictograms :



Signal Word : Danger

Hazard Statements : May be corrosive to metals.
 Causes severe skin burns and eye damage.

Precautionary Statements : **Prevention:**
 Keep only in original container. Wash skin thoroughly after handling.
 Wear protective gloves/ protective clothing/ eye protection/ face protection. Do not breathe dusts or mists.
Response:
 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON

SAFETY DATA SHEET

BLUE CORAL HI PH 3692

CENTER or doctor/ physician.

Absorb spillage to prevent material damage. Wash contaminated clothing before reuse.

Storage:

Store locked up. Store in corrosive resistant container with a resistant inner liner.

Disposal:

Dispose of contents/ container to an approved waste disposal plant.

Product AT USE DILUTION

Precautionary Statements

Prevention:

Wash hands thoroughly after handling.

Response:

Get medical advice/ attention if you feel unwell.

Storage:

Store in accordance with local regulations.

Product AS SOLD

Other hazards

: None known.

Section: 3. COMPOSITION/INFORMATION ON INGREDIENTS**Product AS SOLD**

Pure substance/mixture

: Mixture

Chemical Name

sodium hydroxide

ethylenediamine tetraacetate

CAS-No.

1310-73-2

64-02-8

Concentration: (%)

5 - 10

1 - 5

Product AT USE DILUTION

No hazardous ingredients

Section: 4. FIRST AID MEASURES**Product AS SOLD**

In case of eye contact

: Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Get medical attention immediately.

In case of skin contact

: Wash off immediately with plenty of water for at least 15 minutes. Use a mild soap if available. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention immediately.

If swallowed

: Rinse mouth with water. Do NOT induce vomiting. Never give anything by mouth to an unconscious person. Get medical attention immediately.

Contact the Poison's Information Centre (eg Australia 13 1126; New Zealand 0800 764 766).

If inhaled

: Remove to fresh air. Treat symptomatically. Get medical attention if symptoms occur.

Protection of first-aiders

: If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Notes to physician

: Treat symptomatically.

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SAFETY DATA SHEET

BLUE CORAL HI PH 3692

Most important symptoms and effects, both acute and delayed : See Section 11 for more detailed information on health effects and symptoms.

Product AT USE DILUTION

In case of eye contact : Rinse with plenty of water.

In case of skin contact : Rinse with plenty of water.

If swallowed : Rinse mouth. Get medical attention if symptoms occur.

Contact the Poison's Information Centre (eg Australia 13 1126; New Zealand 0800 764 766).

If inhaled : Get medical attention if symptoms occur.

Section: 5. FIREFIGHTING MEASURES**Product AS SOLD**

Suitable extinguishing media : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable extinguishing media : None known.

Specific hazards during firefighting : Exposure to decomposition products may be a hazard to health.

Hazardous combustion products : Decomposition products may include the following materials:
Carbon oxides
nitrogen oxides (NOx)
Sulphur oxides
metal oxides

Special protective equipment for firefighters : Use personal protective equipment.

Specific extinguishing methods : Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. In the event of fire and/or explosion do not breathe fumes.

Hazchem Code : 2R

Section: 6. ACCIDENTAL RELEASE MEASURES**Product AS SOLD**

Personal precautions, protective equipment and emergency procedures : Ensure adequate ventilation. Keep people away from and upwind of spill/leak. Avoid inhalation, ingestion and contact with skin and eyes. When workers are facing concentrations above the exposure limit they must use appropriate certified respirators. Ensure clean-up is conducted by trained personnel only. Refer to protective measures listed in sections 7 and 8.

Environmental precautions : Do not allow contact with soil, surface or ground water.

Methods and materials for containment and cleaning up : Stop leak if safe to do so. Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous

SAFETY DATA SHEET**BLUE CORAL HI PH 3692**

earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13). Flush away traces with water. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway.

Product AT USE DILUTION

Personal precautions,
protective equipment and
emergency procedures

: Refer to protective measures listed in sections 7 and 8.

Environmental precautions

: No special environmental precautions required.

Methods and materials for
containment and cleaning up

: Stop leak if safe to do so. Contain spillage, and then collect with non-combustible absorbent material, (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations (see section 13). Flush away traces with water. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway.

Section: 7. HANDLING AND STORAGE**Product AS SOLD**

Advice on safe handling

: Do not ingest. Do not breathe dust/fume/gas/mist/vapours/spray. Use only with adequate ventilation. Wash hands thoroughly after handling. Do not get in eyes, on skin, or on clothing.

Conditions for safe storage

: Keep out of reach of children. Keep container tightly closed. Store in suitable labeled containers.

Storage temperature

: 0 °C to 45 °C

Product AT USE DILUTION

Advice on safe handling

: Wash hands after handling. For personal protection see section 8.

Conditions for safe storage

: Keep out of reach of children. Keep container tightly closed. Store in suitable labeled containers.

Section: 8. EXPOSURE CONTROLS/PERSONAL PROTECTION**Product AS SOLD****Components with workplace control parameters**

Components	CAS-No.	Form of exposure	Permissible concentration	Basis
sodium hydroxide	1310-73-2	Peak limit	2 mg/m3	AU OEL

Engineering measures

: Effective exhaust ventilation system. Maintain air concentrations below occupational exposure standards.

Personal protective equipment

Eye protection

: Safety goggles
Face-shield
Wear chemical splash goggles.

Hand protection

: Wear the following personal protective equipment:
Standard glove type.

SAFETY DATA SHEET

BLUE CORAL HI PH 3692

	Gloves should be discarded and replaced if there is any indication of degradation or chemical breakthrough. Laminate film Nitrile Unsupported neoprene Natural rubber Neoprene/natural rubber blend
Skin protection	: Personal protective equipment comprising: suitable protective gloves, safety goggles and protective clothing
Respiratory protection	: When workers are facing concentrations above the exposure limit they must use appropriate certified respirators.
Hygiene measures	: Handle in accordance with good industrial hygiene and safety practice. Remove and wash contaminated clothing before re-use. Wash face, hands and any exposed skin thoroughly after handling. Provide suitable facilities for quick drenching or flushing of the eyes and body in case of contact or splash hazard.

Product AT USE DILUTION

Engineering measures	: Good general ventilation should be sufficient to control worker exposure to airborne contaminants.
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Personal protective equipment

Eye protection	: No special protective equipment required.
Hand protection	: No special protective equipment required.
Skin protection	: No special protective equipment required.
Respiratory protection	: No personal respiratory protective equipment normally required.

Section: 9. PHYSICAL AND CHEMICAL PROPERTIES

	Product AS SOLD	Product AT USE DILUTION
Appearance	: liquid	liquid
Colour	: clear, light blue	colourless
Odour	: odourless	odourless
pH	: 11.5 - 12.5, 100 %	8.0 - 9.5
Flash point	: Not applicable., Does not sustain combustion.	
Odour Threshold	: no data available	
Melting point/freezing point	: no data available	
Initial boiling point and boiling range	: > 100 °C	
Evaporation rate	: no data available	
Flammability (solid, gas)	: no data available	
Upper explosion limit	: no data available	
Lower explosion limit	: no data available	
Vapour pressure	: no data available	
Relative vapour density	: no data available	

SAFETY DATA SHEET**BLUE CORAL HI PH 3692**

Relative density	: 1.11 - 1.14
Water solubility	: soluble
Solubility in other solvents	: no data available
Partition coefficient: n-octanol/water	: no data available
Auto-ignition temperature	: no data available
Thermal decomposition	: no data available
Viscosity, kinematic	: no data available
Explosive properties	: no data available
Oxidizing properties	: no data available
Molecular weight	: no data available
VOC	: no data available

Section: 10. STABILITY AND REACTIVITY**Product AS SOLD**

Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No dangerous reaction known under conditions of normal use.
Conditions to avoid	: None known.
Incompatible materials	: Acids Metals
Hazardous decomposition products	: Decomposition products may include the following materials: Carbon oxides nitrogen oxides (NOx) Sulphur oxides metal oxides

Section: 11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure	: Inhalation, Eye contact, Skin contact
--	---

Potential Health Effects**Product AS SOLD**

Eyes	: Causes serious eye damage.
Skin	: Causes severe skin burns.
Ingestion	: Causes digestive tract burns.
Inhalation	: May cause nose, throat, and lung irritation.
Chronic Exposure	: Health injuries are not known or expected under normal use.

Product AT USE DILUTION

Eyes	: Health injuries are not known or expected under normal use.
Skin	: Health injuries are not known or expected under normal use.

SAFETY DATA SHEET**BLUE CORAL HI PH 3692**

Ingestion	: Health injuries are not known or expected under normal use.
Inhalation	: Health injuries are not known or expected under normal use.
Chronic Exposure	: Health injuries are not known or expected under normal use.

Experience with human exposure**Product AS SOLD**

Eye contact	: Redness, Pain, Corrosion
Skin contact	: Redness, Pain, Corrosion
Ingestion	: Corrosion, Abdominal pain
Inhalation	: Respiratory irritation, Cough

Product AT USE DILUTION

Eye contact	: No symptoms known or expected.
Skin contact	: No symptoms known or expected.
Ingestion	: No symptoms known or expected.
Inhalation	: No symptoms known or expected.

Toxicity**Product AS SOLD****Product**

Acute oral toxicity	: Acute toxicity estimate : > 2,000 mg/kg
Acute inhalation toxicity	: no data available
Acute dermal toxicity	: no data available
Skin corrosion/irritation	: no data available
Serious eye damage/eye irritation	: no data available
Respiratory or skin sensitization	: no data available
Carcinogenicity	: no data available
Reproductive effects	: no data available
Germ cell mutagenicity	: no data available
Teratogenicity	: no data available
STOT - single exposure	: no data available
STOT - repeated exposure	: no data available
Aspiration toxicity	: no data available

Section: 12. ECOLOGICAL INFORMATION**Product AS SOLD****Ecotoxicity**

Environmental Effects	: This product has no known ecotoxicological effects.
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SAFETY DATA SHEET**BLUE CORAL HI PH 3692****Product**

Toxicity to fish : no data available

Toxicity to daphnia and other aquatic invertebrates : no data available

Toxicity to algae : no data available

Components

Toxicity to fish : ethylenediamine tetraacetate
96 h LC50 Fish: 121 mg/l

Components

Toxicity to daphnia and other aquatic invertebrates : sodium hydroxide
48 h EC50: 40 mg/l

Persistence and degradability

no data available

Bioaccumulative potential

no data available

Mobility in soil

no data available

Other adverse effects

no data available

Section: 13. DISPOSAL CONSIDERATIONS**Product AS SOLD**

Disposal methods : Where possible recycling is preferred to disposal or incineration. If recycling is not practicable, dispose of in compliance with local regulations. Dispose of wastes in an approved waste disposal facility.

Disposal considerations : Dispose of as unused product. Empty containers should be taken to an approved waste handling site for recycling or disposal. Do not re-use empty containers. Dispose of in accordance with local, state, and federal regulations.

Product AT USE DILUTION

Disposal methods : Diluted product can be flushed to sanitary sewer.

Disposal considerations : Dispose of in accordance with local, state, and federal regulations.

Section: 14. TRANSPORT INFORMATION**Product AS SOLD**

The shipper/consignor/sender is responsible to ensure that the packaging, labeling, and markings are in compliance with the selected mode of transport.

Land transport (ADG)

UN number : 1824

Description of the goods : SODIUM HYDROXIDE SOLUTION

SAFETY DATA SHEET**BLUE CORAL HI PH 3692**

Class : 8
 Packing group : II
 Hazchem Code : 2R
 Environmentally hazardous : No

Sea transport (IMDG/IMO)

UN number : 1824
 Description of the goods : SODIUM HYDROXIDE SOLUTION
 Class : 8
 Packing group : II
 Marine pollutant : No

Section: 15. REGULATORY INFORMATION**National regulatory information**

Standard for the Uniform : Schedule 6
 Scheduling of Medicines and
 Poisons

The components of this product are reported in the following inventories:

United States TSCA Inventory :

On TSCA Inventory

Canadian Domestic Substances List (DSL) :

All components of this product are on the Canadian DSL.

Australia. Industrial Chemical (Notification and Assessment) Act :

On the inventory, or in compliance with the inventory

New Zealand. Inventory of Chemicals (NZIoC), as published by ERMA New Zealand :

not determined

Japan. ENCS - Existing and New Chemical Substances Inventory :

not determined

Japan. ISHL - Inventory of Chemical Substances (METI) :

not determined

Korea. Korean Existing Chemicals Inventory (KECI) :

On the inventory, or in compliance with the inventory

Philippines Inventory of Chemicals and Chemical Substances (PICCS) :

not determined

China Inventory of Existing Chemical Substances :

On the inventory, or in compliance with the inventory

Section: 16. OTHER INFORMATION

Sources of key data used to compile the Safety Data Sheet

Globally Harmonized System of Classification and Labelling of Chemicals (GHS)
 IARC: (International Agency for Research on Cancer)
 US. National Toxicology Program (NTP) Report on Carcinogens
 ECHA List of Publishable Substances Registered

SAFETY DATA SHEET**BLUE CORAL HI PH 3692**

EU HPVCs (High Production Volume Chemicals)

Issuing date : 17.06.2016
version : 1.0
Prepared by : Regulatory Affairs

REVISED INFORMATION: Significant changes to regulatory or health information for this revision is indicated by a bar in the left-hand margin of the SDS.

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

**Cover Sheet for Safety Data Sheet****1. Identification of the Substance/Preparation and of the Company/Undertaking**

Product Name **BLUE CORAL PRESOAK LIME 5GAL**

Overseas Supplier Zep Inc

NZ Distributor Velocity Vehicle Care NZ Ltd
Level 4
3 London St, Hamilton, 3240
Phone: 0800 4 83562 (0800 4 VELOC)
Fax: 07 974 9540
Email: orders@velocityvehiclecare.com

Emergency Number **New Zealand: 0800 243 622**

This product is Hazardous according to the NZ Hazardous Substances (Classification) Regulations 2001.

Australian Distributor Velocity Vehicle Care Pty Ltd
27-33 Tottenham Pde, Tottenham, VIC 3012
Ph: 1300 990 074
Fax: 03 8669 4179
Email: orders@velocityvehiclecare.com

Emergency Number **Australia: 1800 127 406**

This product is Hazardous according to the Approved Criteria for Classifying Hazardous Substances [NOHSC:1008 (2004)]

Cover Sheet prepared 1st Nov 2016 by Velocity Vehicle Care

SAFETY DATA SHEET



BCL PRESOAK LIME 5GL

Version 1.0

Revision Date 12/15/2014

Print Date 11/14/2016

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : BCL PRESOAK LIME 5GL

Material number : 000000000007600079

Manufacturer or supplier's details

Company : Zep Inc.

Address : 1310 Seaboard Industrial Blvd., NW
Atlanta, GA 30318

Telephone : 404-352-1680

Emergency telephone numbers**For SDS Information** : Compliance Services 1-877-428-9937**For a Medical Emergency** : 877-541-2016 Toll Free - All Calls Recorded**For a Transportation
Emergency** : CHEMTREC: 800-424-9300 - All Calls Recorded.
In the District of Columbia 202-483-7616

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	dark blue
Odour	characteristic

GHS Classification

Skin corrosion : Category 1A

Serious eye damage : Category 1

GHS Label element

Hazard pictograms :



Signal word : Danger

Hazard statements : H314 Causes severe skin burns and eye damage.

Precautionary statements : **Prevention:**
 P264 Wash skin thoroughly after handling.
 P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response:
 P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
 P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.

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P304 + P340 + P310 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.
 P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
 P363 Wash contaminated clothing before reuse.

Storage:

P405 Store locked up.

Disposal:

P501 Dispose of contents/container in accordance with local regulation.

Potential Health Effects**Carcinogenicity:****IARC**

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

ACGIH

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by ACGIH.

OSHA

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical Name	CAS-No.	Concentration [%]
potassium hydroxide	1310-58-3	>= 1 - < 5
Silicic acid, sodium salt	1344-09-8	>= 1 - < 5
tetrasodium ethylenediaminetetraacetate	64-02-8	>= 1 - < 5

SECTION 4. FIRST AID MEASURES

General advice : Consult a physician.
 Show this safety data sheet to the doctor in attendance.
 Do not leave the victim unattended.

If inhaled : If unconscious place in recovery position and seek medical advice.

In case of skin contact : Immediate medical treatment is necessary as untreated wounds from corrosion of the skin heal slowly and with difficulty.

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- If on skin, rinse well with water.
If on clothes, remove clothes.
- In case of eye contact : Remove contact lenses.
Rinse immediately with plenty of water, also under the eyelids,
for at least 15 minutes.
- If swallowed : Clean mouth with water and drink afterwards plenty of water.
Keep respiratory tract clear.
Do NOT induce vomiting.
Do not give milk or alcoholic beverages.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician.
Take victim immediately to hospital.

SECTION 5. FIREFIGHTING MEASURES

- Suitable extinguishing media : Foam
Carbon dioxide (CO2)
- Unsuitable extinguishing media : High volume water jet
- Hazardous combustion products : Carbon dioxide (CO2)
Carbon monoxide
Smoke
- Specific extinguishing methods : Use extinguishing measures that are appropriate to local
circumstances and the surrounding environment.
- Special protective equipment for firefighters : Wear self-contained breathing apparatus for firefighting if
necessary.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions, protective equipment and emergency procedures : Use personal protective equipment.
Ensure adequate ventilation.
Evacuate personnel to safe areas.
Keep people away from and upwind of spill/leak.
Material can create slippery conditions.
- Environmental precautions : Prevent product from entering drains.
Prevent further leakage or spillage if safe to do so.
If the product contaminates rivers and lakes or drains inform
respective authorities.
- Methods and materials for containment and cleaning up : Keep in suitable, closed containers for disposal.
Clean contaminated floors and objects thoroughly while
observing environmental regulations.

SECTION 7. HANDLING AND STORAGE

- Advice on safe handling : Avoid contact with skin and eyes.

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For personal protection see section 8.
Smoking, eating and drinking should be prohibited in the application area.

Conditions for safe storage : Keep container tightly closed in a dry and well-ventilated place.
Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.

Materials to avoid : Oxidizing agents
Do not store near acids.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
potassium hydroxide	1310-58-3	C	2 mg/m3	ACGIH
		C	2 mg/m3	NIOSH REL
		C	2 mg/m3	OSHA P0

Personal protective equipment

Respiratory protection : In case of insufficient ventilation, wear suitable respiratory equipment.

Hand protection
Remarks : The suitability for a specific workplace should be discussed with the producers of the protective gloves.

Eye protection : Eye wash bottle with pure water
Tightly fitting safety goggles
Wear face-shield and protective suit for abnormal processing problems.

Skin and body protection : impervious clothing
Choose body protection according to the amount and concentration of the dangerous substance at the work place.

Protective measures : Wear suitable protective equipment.
Avoid contact with skin.
When using do not eat, drink or smoke.

Hygiene measures : When using do not eat or drink.
When using do not smoke.
Wash hands before breaks and at the end of workday.

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SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	: liquid
Colour	: dark blue
Odour	: characteristic
Odour Threshold	: no data available
pH	: 13 - 14
Boiling point	: > 100 °C
Flash point	: > 100 °C
Evaporation rate	: no data available
Upper explosion limit	: no data available
Lower explosion limit	: no data available
Vapour pressure	: no data available
Relative vapour density	: no data available
Relative density	: 1.122 (20 °C)
Density	: no data available
Solubility(ies)	
Water solubility	: soluble
Partition coefficient: n-octanol/water	: no data available
Auto-ignition temperature	: not determined
Thermal decomposition	: no data available
Viscosity	
Viscosity, kinematic	: no data available

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: Stable
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No decomposition if stored and applied as directed.
Conditions to avoid	: no data available
Incompatible materials	: Acids Oxidizing agents

SAFETY DATA SHEET

**BCL PRESOAK LIME 5GL**

Version 1.0

Revision Date 12/15/2014

Print Date 11/14/2016

SECTION 11. TOXICOLOGICAL INFORMATION**Acute toxicity****Product:**

Acute oral toxicity : Acute toxicity estimate : 2,147 mg/kg
Method: Calculation method

Skin corrosion/irritation**Product:**

Remarks: Extremely corrosive and destructive to tissue.

Serious eye damage/eye irritation**Product:**

Remarks: May cause irreversible eye damage.

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

potassium hydroxide:
Silicic acid, sodium salt:
tetrasodium ethylenediaminetetraacetate:

STOT - single exposure

no data available

STOT - repeated exposure

no data available

Aspiration toxicity

no data available

Further information**Product:**

Remarks: no data available

SECTION 12. ECOLOGICAL INFORMATION

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Ecotoxicity

no data available

Persistence and degradability

no data available

Bioaccumulative potential

Product:

Partition coefficient: n-octanol/water : Remarks: no data available

Mobility in soil

no data available

Other adverse effects

no data available

Product:

Regulation 40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances

Remarks This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

Additional ecological information : no data available

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Do not dispose of waste into sewer.
Do not contaminate ponds, waterways or ditches with chemical or used container.
Dispose of in accordance with local regulations.

Contaminated packaging : Empty remaining contents.
Dispose of as unused product.
Do not re-use empty containers.

SECTION 14. TRANSPORT INFORMATION

International regulation

IATA-DGR

UN/ID No. : 1719

Proper shipping name : Caustic alkali liquid, n.o.s.

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(SODIUM HYDROXIDE, POTASSIUM HYDROXIDE)

Class : 8

Packing group : II

Labels : 8

Packing instruction (cargo aircraft) : 855

Packing instruction (passenger aircraft) : 851

IMDG-Code

UN number : 1719

Proper shipping name : CAUSTIC ALKALI LIQUID, N.O.S.
(SODIUM HYDROXIDE, POTASSIUM HYDROXIDE)

Class : 8

Packing group : II

Labels : 8

EmS Code : F-A, S-B

Marine pollutant : no

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

National Regulations

49 CFR

UN/ID/NA number : 1719

Proper shipping name : Caustic alkali liquids, n.o.s.
(SODIUM HYDROXIDE, POTASSIUM HYDROXIDE)

Class : 8

Packing group : II

Labels : 8

ERG Code : 154

Marine pollutant : no

Special precautions for user

not applicable

SECTION 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
potassium hydroxide	1310-58-3	1000	*

*: Calculated RQ exceeds reasonably attainable upper limit.

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**BCL PRESOAK LIME 5GL**

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SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Acute Health Hazard

SARA 302 : SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

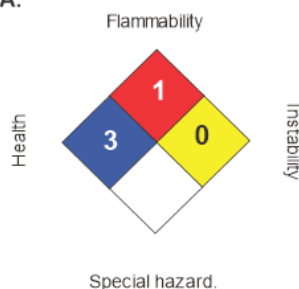
California Prop 65 This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other reproductive harm.

The components of this product are reported in the following inventories:

TSCA On TSCA Inventory
DSL This product contains one or several components that are not on the Canadian DSL nor NDSL.
AICS Not in compliance with the inventory
NZIoC Not in compliance with the inventory
PICCS On the inventory, or in compliance with the inventory
IECSC On the inventory, or in compliance with the inventory

Inventory Acronym and Validity Area Legend:

AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TSCA (USA)

SECTION 16. OTHER INFORMATION**Further information****NFPA:****HMIS III:**

HEALTH	3
FLAMMABILITY	1
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
 2 = Moderate, 3 = High
 4 = Extreme, * = Chronic

OSHA GHS Label Information:

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Hazard pictograms



Signal word

: **Danger:**

Hazard statements

: Causes severe skin burns and eye damage.

Precautionary statements

: **Prevention:** Wash skin thoroughly after handling. Wear protective gloves/ protective clothing/ eye protection/ face protection.: **Response:** IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician. Wash contaminated clothing before reuse.: **Storage:** Store locked up.: **Disposal:** Dispose of contents/container in accordance with local regulation.

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind. The information in this document applies to this specific material as supplied. It may not be valid for this material if it is used in combination with any other materials. Users should make their own investigations to determine the suitability and applicability of the information for their particular purposes. This SDS has been prepared by the Compliance Services organization supporting this manufacturer, supplier or distributor.

Zep Inc. markets products under well recognized and established brand names such as Zep®, Zep Commercial®, Zep Professional®, Enforcer®, National Chemical™, Selig™, Misty®, Next Dimension™, Petro®, i-Chem®, TimeMist®, TimeWick™, MicrobeMax®, Country Vet®, Konk®, Original Bike Spirits®, Blue Coral®, Black Magic®, Rain-X®, Niagara National™, FC Forward Chemicals®, Rexodan®, Mykal™, and a number of private labeled brands.

**Cover Sheet for Safety Data Sheet****1. Identification of the Substance/Preparation and of the Company/Undertaking**

Product Name **BLUE CORAL SOILAWAY 5GAL**

Overseas Supplier Zep Inc

NZ Distributor Velocity Vehicle Care NZ Ltd
Level 4
3 London St, Hamilton, 3240
Phone: 0800 4 83562 (0800 4 VELOC)
Fax: 07 974 9540
Email: orders@velocityvehiclecare.com

Emergency Number **New Zealand: 0800 243 622**

This product is Hazardous according to the NZ Hazardous Substances (Classification) Regulations 2001.

Australian Distributor Velocity Vehicle Care Pty Ltd
27-33 Tottenham Pde, Tottenham VIC 3012
Ph: 1300 990 074
Fax: 03 8669 4179
Email: orders@velocityvehiclecare.com

Emergency Number **Australia: 1800 127 406**

This product is Hazardous according to the Approved Criteria for Classifying Hazardous Substances [NOHSC:1008 (2004)]

Cover Sheet prepared 1st Nov 2016 by Velocity Vehicle Care

SAFETY DATA SHEET



BCL SOILAWAY 5GL

Version 1.2

Revision Date 12/15/2014

Print Date 11/14/2016

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : BCL SOILAWAY 5GL

Material number : 000000000007600093

Manufacturer or supplier's details

Company : Zep Inc.

Address : 1310 Seaboard Industrial Blvd., NW
Atlanta, GA 30318

Telephone : 404-352-1680

Emergency telephone numbers**For SDS Information** : Compliance Services 1-877-428-9937**For a Medical Emergency** : 877-541-2016 Toll Free - All Calls Recorded**For a Transportation
Emergency** : CHEMTREC: 800-424-9300 - All Calls Recorded.
In the District of Columbia 202-483-7616

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	yellow
Odour	characteristic

GHS Classification

Skin corrosion : Category 1A

Serious eye damage : Category 1

GHS Label element

Hazard pictograms :



Signal word : Danger

Hazard statements : H314 Causes severe skin burns and eye damage.

Precautionary statements : **Prevention:**
 P264 Wash skin thoroughly after handling.
 P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response:
 P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
 P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.

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BCL SOILAWAY 5GL

Version 1.2

Revision Date 12/15/2014

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P304 + P340 + P310 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.
 P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
 P363 Wash contaminated clothing before reuse.

Storage:

P405 Store locked up.

Disposal:

P501 Dispose of contents/container in accordance with local regulation.

Potential Health Effects**Carcinogenicity:****IARC**

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

ACGIH

Confirmed animal carcinogen with unknown relevance to humans

2-butoxyethanol

111-76-2

OSHA

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical Name	CAS-No.	Concentration [%]
Sulfonic acids, C14-16-alkane hydroxy and C14-16-alkene, sodium salts	68439-57-6	>= 10 - < 20
disodium metasilicate	6834-92-0	>= 5 - < 10
tetrasodium ethylenediaminetetraacetate	64-02-8	>= 1 - < 5
2-butoxyethanol	111-76-2	>= 1 - < 5
potassium hydroxide	1310-58-3	>= 1 - < 5
sodium xylenesulphonate	1300-72-7	>= 1 - < 5
Alcohols, C9-11, ethoxylated	68439-46-3	>= 1 - < 5

SECTION 4. FIRST AID MEASURES

General advice : Move out of dangerous area.
 Consult a physician.
 Show this safety data sheet to the doctor in attendance.
 Do not leave the victim unattended.

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- | | |
|-------------------------|---|
| If inhaled | : Remove person to fresh air. If signs/symptoms continue, get medical attention. |
| In case of skin contact | : Take off contaminated clothing and shoes immediately.
If on skin, rinse well with water.
If on clothes, remove clothes. |
| In case of eye contact | : Remove contact lenses.
Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. |
| If swallowed | : Keep respiratory tract clear.
Do not give milk or alcoholic beverages.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician. |

SECTION 5. FIREFIGHTING MEASURES

- | | |
|---|---|
| Suitable extinguishing media | : Dry chemical |
| Unsuitable extinguishing media | : High volume water jet |
| Hazardous combustion products | : Carbon dioxide (CO2)
Carbon monoxide
Sulphur oxides
Smoke |
| Specific extinguishing methods | : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment. |
| Special protective equipment for firefighters | : Wear self-contained breathing apparatus for firefighting if necessary. |

SECTION 6. ACCIDENTAL RELEASE MEASURES

- | | |
|---|--|
| Personal precautions, protective equipment and emergency procedures | : Use personal protective equipment.
Ensure adequate ventilation.
Evacuate personnel to safe areas.
Keep people away from and upwind of spill/leak.
Material can create slippery conditions. |
| Environmental precautions | : Prevent product from entering drains.
Prevent further leakage or spillage if safe to do so.
If the product contaminates rivers and lakes or drains inform respective authorities. |
| Methods and materials for containment and cleaning up | : Neutralise with acid.
Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust).
Keep in suitable, closed containers for disposal. |

SAFETY DATA SHEET



BCL SOILAWAY 5GL

Version 1.2

Revision Date 12/15/2014

Print Date 11/14/2016

SECTION 7. HANDLING AND STORAGE

- Advice on safe handling : For personal protection see section 8.
Smoking, eating and drinking should be prohibited in the application area.
- Conditions for safe storage : Keep container tightly closed in a dry and well-ventilated place.
Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.
- Materials to avoid : Do not store near acids.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
2-butoxyethanol	111-76-2	TWA	20 ppm	ACGIH
		TWA	5 ppm	NIOSH REL
			24 mg/m3	
		TWA	50 ppm	OSHA Z-1
			240 mg/m3	
		TWA	25 ppm	OSHA P0
			120 mg/m3	
potassium hydroxide	1310-58-3	C	2 mg/m3	ACGIH
		C	2 mg/m3	NIOSH REL
		C	2 mg/m3	OSHA P0

Biological occupational exposure limits

Component	CAS-No.	Control parameters	Biological specimen	Sampling time	Permissible concentration	Basis
2-BUTOXYETHANOL	111-76-2	Butoxyacetic acid (BAA)	Urine	End of shift (As soon as possible after exposure ceases)	200 mg/g	ACGIH BEI
Remarks: Creatinine						

Personal protective equipment

- Respiratory protection : In case of insufficient ventilation, wear suitable respiratory equipment.
- Hand protection
- Remarks : The suitability for a specific workplace should be discussed with the producers of the protective gloves.

SAFETY DATA SHEET

**BCL SOILAWAY 5GL**

Version 1.2

Revision Date 12/15/2014

Print Date 11/14/2016

Eye protection	: Eye wash bottle with pure water Tightly fitting safety goggles Wear face-shield and protective suit for abnormal processing problems.
Skin and body protection	: impervious clothing Choose body protection according to the amount and concentration of the dangerous substance at the work place.
Protective measures	: Wear suitable protective equipment. Avoid contact with skin. When using do not eat, drink or smoke.
Hygiene measures	: When using do not eat or drink. When using do not smoke. Wash hands before breaks and at the end of workday.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	: liquid
Colour	: yellow
Odour	: characteristic
Odour Threshold	: no data available
pH	: 12.5 - 13.5
Melting point/freezing point	: no data available
Boiling point	: no data available
Flash point	: > 100 °C
Evaporation rate	: no data available
Upper explosion limit	: no data available
Lower explosion limit	: no data available
Vapour pressure	: no data available
Relative vapour density	: no data available
Relative density	: 1.07 - 1.11
Density	: no data available
Solubility(ies)	
Water solubility	: no data available
Solubility in other solvents	: not applicable
Partition coefficient: n-octanol/water	: no data available
Auto-ignition temperature	: not determined
Thermal decomposition	: no data available
Viscosity	

SAFETY DATA SHEET



BCL SOILAWAY 5GL

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Print Date 11/14/2016

Viscosity, kinematic : no data available

SECTION 10. STABILITY AND REACTIVITY

Reactivity : Stable

Chemical stability : Stable under normal conditions.

Possibility of hazardous reactions : No decomposition if stored and applied as directed.

Conditions to avoid : no data available

Incompatible materials : Acids

Hazardous decomposition products : No decomposition if stored normally.

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Product:

Acute oral toxicity : Acute toxicity estimate : 3,657 mg/kg
Method: Calculation method

Acute inhalation toxicity : Acute toxicity estimate : > 40 mg/l
Exposure time: 4 h
Test atmosphere: vapour
Method: Calculation method

Acute dermal toxicity : Acute toxicity estimate : > 5,000 mg/kg
Method: Calculation method

Components:disodium metasilicate:

Acute oral toxicity : LD50 rat: 1,153 mg/kg

Alcohols, C9-11, ethoxylated:

Acute oral toxicity : LD50 Oral rat: 1,400 mg/kg

Skin corrosion/irritation

Product:

Remarks: Extremely corrosive and destructive to tissue.

Serious eye damage/eye irritation

Product:

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Remarks: May cause irreversible eye damage.

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

Sulfonic acids, C14-16-alkane hydroxy and C14-16-alkene, sodium salts:
disodium metasilicate:
tetrasodium ethylenediaminetetraacetate:
2-butoxyethanol:
potassium hydroxide:
sodium xylenesulphonate:
Alcohols, C9-11, ethoxylated:

STOT - single exposure

no data available

STOT - repeated exposure

no data available

Aspiration toxicity

no data available

Further information**Product:**

Remarks: no data available

SECTION 12. ECOLOGICAL INFORMATION**Ecotoxicity**

no data available

Persistence and degradability

no data available

Bioaccumulative potential**Product:**

Partition coefficient: n-octanol/water : Remarks: no data available

Mobility in soil

no data available

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Other adverse effects

no data available

Product:

Regulation

40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances

Remarks

This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

Additional ecological information

: no data available

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues

: Do not dispose of waste into sewer.
Do not contaminate ponds, waterways or ditches with chemical or used container.
Dispose of in accordance with local regulations.

Contaminated packaging

: Empty remaining contents.
Dispose of as unused product.
Do not re-use empty containers.

SECTION 14. TRANSPORT INFORMATION

International regulation**IATA-DGR**

UN/ID No.

: 3266

Proper shipping name

: Corrosive liquid, basic, inorganic, n.o.s.
(SODIUM METASILICATE)

Class

: 8

Packing group

: III

Labels

: 8

Packing instruction (cargo aircraft)

: 856

Packing instruction (passenger aircraft)

: 852

IMDG-Code

UN number

: 3266

Proper shipping name

: CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S.
(SODIUM METASILICATE)

Class

: 8

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Packing group : III
 Labels : 8
 EmS Code : F-A, S-B
 Marine pollutant : no

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

National Regulations

49 CFR

UN/ID/NA number : 3266
 Proper shipping name : Corrosive liquid, basic, inorganic, n.o.s.
 (SODIUM METASILICATE)
 Class : 8
 Packing group : III
 Labels : 8
 ERG Code : 154
 Marine pollutant : no

Special precautions for user

not applicable

SECTION 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
potassium hydroxide	1310-58-3	1000	*

*: Calculated RQ exceeds reasonably attainable upper limit.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Acute Health Hazard

SARA 302 : SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

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Revision Date 12/15/2014

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California Prop 65

This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other reproductive harm.

The components of this product are reported in the following inventories:

TSCA	On TSCA Inventory
DSL	This product contains one or several components that are not on the Canadian DSL nor NDSL.
AICS	Not in compliance with the inventory
NZIoC	Not in compliance with the inventory
PICCS	Not in compliance with the inventory
IECSC	Not in compliance with the inventory

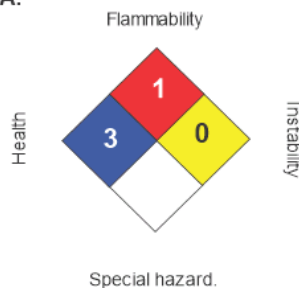
Inventory Acronym and Validity Area Legend:

AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TSCA (USA)

SECTION 16. OTHER INFORMATION

Further information

NFPA:



HMIS III:

HEALTH	3
FLAMMABILITY	1
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

OSHA GHS Label Information:

Hazard pictograms



Signal word

Hazard statements

Precautionary statements

Danger:

Causes severe skin burns and eye damage.

Prevention: Wash skin thoroughly after handling. Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician. Wash contaminated clothing before reuse.

Storage: Store locked up.

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Disposal: Dispose of contents/container in accordance with local regulation.

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind. The information in this document applies to this specific material as supplied. It may not be valid for this material if it is used in combination with any other materials. Users should make their own investigations to determine the suitability and applicability of the information for their particular purposes.

This SDS has been prepared by the Compliance Services organization supporting this manufacturer, supplier or distributor.

Zep Inc. markets products under well recognized and established brand names such as Zep®, Zep Commercial®, Zep Professional®, Enforcer®, National Chemical™, Selig™, Misty®, Next Dimension™, Petro®, i-Chem®, TimeMist®, TimeWick™, MicrobeMax®, Country Vet®, Konk®, Original Bike Spirits®, Blue Coral®, Black Magic®, Rain-X®, Niagara National™, FC Forward Chemicals®, Rexodan®, Mykal™, and a number of private labeled brands.

**Cover Sheet for Safety Data Sheet****1. Identification of the Substance/Preparation and of the Company/Undertaking**

Product Name **BLUE CORAL TIRE & ENGINE CLNR 5GAL**

Overseas Supplier Zep Inc

NZ Distributor Velocity Vehicle Care NZ Ltd
Level 4
3 London St, Hamilton, 3240
Phone: 0800 4 83562 (0800 4 VELOC)
Fax: 07 974 9540
Email: orders@velocityvehiclecare.com

Emergency Number **New Zealand: 0800 243 622**

This product is Hazardous according to the NZ Hazardous Substances (Classification) Regulations 2001.

Australian Distributor Velocity Vehicle Care Pty Ltd
27-33 Tottenham Pde, Tottenham VIC 3012
Ph: 1300 990 074
Fax: 03 8669 4179
Email: orders@velocityvehiclecare.com

Emergency Number **Australia: 1800 127 406**

This product is Hazardous according to the Approved Criteria for Classifying Hazardous Substances [NOHSC:1008 (2004)]

Cover Sheet prepared 1st Nov 2016 by Velocity Vehicle Care

SAFETY DATA SHEET



BCL TIRE & ENGINE CLNR 5GL

Version 1.4

Revision Date 03/05/2015

Print Date 11/14/2016

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Material name : BCL TIRE & ENGINE CLNR 5GL

Material number : 000000000007600081

Manufacturer or supplier's details

Company : Zep Inc.

Address : 1310 Seaboard Industrial Blvd., NW
Atlanta, GA 30318

Telephone : 404-352-1680

Emergency telephone numbers**For SDS Information** : Compliance Services 1-877-428-9937**For a Medical Emergency** : 877-541-2016 Toll Free - All Calls Recorded**For a Transportation
Emergency** : CHEMTREC: 800-424-9300 - All Calls Recorded.
In the District of Columbia 202-483-7616

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	dark green
Odour	characteristic

GHS Classification

Skin corrosion : Category 1A

Serious eye damage : Category 1

GHS Label element

Hazard pictograms :



Signal word : Danger

Hazard statements : H314 Causes severe skin burns and eye damage.

Precautionary statements : **Prevention:**
 P264 Wash skin thoroughly after handling.
 P280 Wear protective gloves/ protective clothing/ eye protection/ face protection.

Response:
 P301 + P330 + P331 IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
 P303 + P361 + P353 IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.

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P304 + P340 + P310 IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.
 P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
 P363 Wash contaminated clothing before reuse.

Storage:

P405 Store locked up.

Disposal:

P501 Dispose of contents/container in accordance with local regulation.

Potential Health Effects**Carcinogenicity:****IARC**

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

ACGIH

Confirmed animal carcinogen with unknown relevance to humans

2-butoxyethanol

111-76-2

ethanol

64-17-5

OSHA

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous components

Chemical Name	CAS-No.	Concentration [%]
Sulfonic acids, C14-16-alkane hydroxy and C14-16-alkene, sodium salts	68439-57-6	>= 1 - < 5
potassium hydroxide	1310-58-3	>= 1 - < 5
Polyacrylic-maleic acid, sodium salt	Not Assigned	>= 1 - < 5
2-butoxyethanol	111-76-2	>= 1 - < 5
Silicic acid, sodium salt	1344-09-8	>= 1 - < 5
Sodium laureth (n=>3) sulfate	9004-82-4	>= 1 - < 5
sodium xylenesulphonate	1300-72-7	>= 1 - < 5

SECTION 4. FIRST AID MEASURES

General advice : Move out of dangerous area.
 Show this safety data sheet to the doctor in attendance.
 Do not leave the victim unattended.

SAFETY DATA SHEET

**BCL TIRE & ENGINE CLNR 5GL**

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- | | |
|-------------------------|---|
| If inhaled | : Consult a physician after significant exposure.
If unconscious place in recovery position and seek medical advice. |
| In case of skin contact | : Wash off immediately with plenty of water for at least 15 minutes.
If skin irritation persists, call a physician.
If on clothes, remove clothes. |
| In case of eye contact | : Remove contact lenses.
Protect unharmed eye.
Keep eye wide open while rinsing.
If eye irritation persists, consult a specialist.
Rinse immediately with plenty of water for at least 15 minutes. |
| If swallowed | : Keep respiratory tract clear.
Never give anything by mouth to an unconscious person.
If symptoms persist, call a physician.
DO NOT induce vomiting unless directed to do so by a physician or poison control center.
Take victim immediately to hospital. |

SECTION 5. FIREFIGHTING MEASURES

- | | |
|---|--|
| Suitable extinguishing media | : Dry chemical
Water spray jet
Carbon dioxide (CO2)
Alcohol-resistant foam |
| Unsuitable extinguishing media | : High volume water jet |
| Specific hazards during firefighting | : Do not allow run-off from fire fighting to enter drains or water courses. |
| Hazardous combustion products | : Carbon dioxide (CO2)
Carbon monoxide
Sulphur oxides
Smoke |
| Specific extinguishing methods | : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment. |
| Further information | : Collect contaminated fire extinguishing water separately. This must not be discharged into drains.
Standard procedure for chemical fires. |
| Special protective equipment for firefighters | : Wear self-contained breathing apparatus for firefighting if necessary. |

SECTION 6. ACCIDENTAL RELEASE MEASURES

- | | |
|---|---|
| Personal precautions, protective equipment and emergency procedures | : Use personal protective equipment.
Ensure adequate ventilation.
Evacuate personnel to safe areas. |
|---|---|

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Remove all sources of ignition.

Environmental precautions : Prevent product from entering drains.
Prevent further leakage or spillage if safe to do so.
If the product contaminates rivers and lakes or drains inform respective authorities.

Methods and materials for containment and cleaning up : Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust).
Sweep up or vacuum up spillage and collect in suitable container for disposal.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling : Avoid exposure - obtain special instructions before use.
Avoid contact with skin and eyes.
For personal protection see section 8.
Smoking, eating and drinking should be prohibited in the application area.
Do not breathe vapours or spray mist.
Take precautionary measures against static discharges.
Provide sufficient air exchange and/or exhaust in work rooms.
Dispose of rinse water in accordance with local and national regulations.

Conditions for safe storage : Observe label precautions.
Electrical installations / working materials must comply with the technological safety standards.
Keep in a dry, cool and well-ventilated place.

Materials to avoid : Do not store near acids.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
potassium hydroxide	1310-58-3	C	2 mg/m3	ACGIH
		C	2 mg/m3	NIOSH REL
		C	2 mg/m3	OSHA P0
2-butoxyethanol	111-76-2	TWA	20 ppm	ACGIH
		TWA	5 ppm	NIOSH REL
			24 mg/m3	
		TWA	50 ppm	OSHA Z-1
			240 mg/m3	
		TWA	25 ppm	OSHA P0
			120 mg/m3	
ethanol	64-17-5	TWA	1,000 ppm	ACGIH
		TWA	1,000 ppm	NIOSH REL
			1,900 mg/m3	

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BCL TIRE & ENGINE CLNR 5GL

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		TWA	1,000 ppm 1,900 mg/m3	OSHA Z-1
		TWA	1,000 ppm 1,900 mg/m3	OSHA P0

Biological occupational exposure limits

Component	CAS-No.	Control parameters	Biological specimen	Sampling time	Permissible concentration	Basis
2-BUTOXYETHANOL	111-76-2	Butoxyacetic acid (BAA)	Urine	End of shift (As soon as possible after exposure ceases)	200 mg/g	ACGIH BEI
Remarks: Creatinine						

Personal protective equipment

- Respiratory protection : In case of insufficient ventilation, wear suitable respiratory equipment.
Use respiratory protection unless adequate local exhaust ventilation is provided or exposure assessment demonstrates that exposures are within recommended exposure guidelines.
- Hand protection
Remarks : The suitability for a specific workplace should be discussed with the producers of the protective gloves.
- Eye protection : Ensure that eyewash stations and safety showers are close to the workstation location.
Tightly fitting safety goggles
- Skin and body protection : impervious clothing
Choose body protection according to the amount and concentration of the dangerous substance at the work place.
- Protective measures : Wear suitable protective equipment.
Avoid contact with skin.
- Hygiene measures : When using do not eat or drink.
When using do not smoke.
Wash hands before breaks and at the end of workday.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

- Appearance : liquid
- Colour : dark green
- Odour : characteristic
- Odour Threshold : no data available
- pH : 13 - 14, 100 % (as aqueous solution)

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Melting point/freezing point	: no data available
Boiling point	: no data available
Flash point	: > 100 °C
Evaporation rate	: no data available
Upper explosion limit	: no data available
Lower explosion limit	: no data available
Vapour pressure	: no data available
Relative vapour density	: no data available
Relative density	: 1.08 - 1.14
Density	: no data available
Solubility(ies)	
Water solubility	: no data available
Solubility in other solvents	: not determined
Partition coefficient: n-octanol/water	: no data available
Auto-ignition temperature	: not determined
Thermal decomposition	: no data available
Viscosity	
Viscosity, kinematic	: no data available

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: Stable
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No decomposition if stored and applied as directed.
Conditions to avoid	: no data available
Incompatible materials	: Acids Metals
Hazardous decomposition products	: No hazardous decomposition products are known.

SECTION 11. TOXICOLOGICAL INFORMATION**Acute toxicity****Product:**

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Acute oral toxicity	: Acute toxicity estimate : 2,649 mg/kg Method: Calculation method
Acute inhalation toxicity	: Acute toxicity estimate : > 40 mg/l Exposure time: 4 h Test atmosphere: vapour Method: Calculation method
Acute dermal toxicity	: Acute toxicity estimate : > 5,000 mg/kg Method: Calculation method

Skin corrosion/irritation**Product:**

Remarks: Extremely corrosive and destructive to tissue.

Serious eye damage/eye irritation**Product:**

Remarks: May cause irreversible eye damage.

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

Sulfonic acids, C14-16-alkane hydroxy and C14-16-alkene, sodium salts:
 potassium hydroxide:
 Polyacrylic-maleic acid, sodium salt:
 2-butoxyethanol:
 Silicic acid, sodium salt:
 Sodium laureth (n>=3) sulfate:
 sodium xylenesulphonate:

STOT - single exposure

no data available

STOT - repeated exposure

no data available

Aspiration toxicity

no data available

Further information**Product:**

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BCL TIRE & ENGINE CLNR 5GL

Version 1.4

Revision Date 03/05/2015

Print Date 11/14/2016

Remarks: no data available

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

no data available

Persistence and degradability

no data available

Bioaccumulative potential

Product:

Partition coefficient: n-octanol/water : Remarks: no data available

Mobility in soil

no data available

Other adverse effects

no data available

Product:

Regulation

40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances

Remarks

This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

Additional ecological information : no data available

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Do not contaminate ponds, waterways or ditches with chemical or used container.
The product should not be allowed to enter drains, water courses or the soil.
Dispose of in accordance with local regulations.Contaminated packaging : Empty remaining contents.
Dispose of as unused product.
Do not re-use empty containers.
Do not burn, or use a cutting torch on, the empty drum.

SAFETY DATA SHEET

**BCL TIRE & ENGINE CLNR 5GL**

Version 1.4

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SECTION 14. TRANSPORT INFORMATION

Transportation Regulation: 49 CFR (USA):
UN1824, Sodium hydroxide solution, 8, II

Transportation Regulation: IMDG (Vessel):
UN1824, SODIUM HYDROXIDE SOLUTION, 8, II

Transportation Regulation: IATA (Cargo Air):
UN1824, Sodium hydroxide solution, 8, II

Transportation Regulation: IATA (Passenger Air):
UN1824, Sodium hydroxide solution, 8, II

Transportation Regulation: TDG (Canada):
UN1824, SODIUM HYDROXIDE SOLUTION, 8, II

SECTION 15. REGULATORY INFORMATION**EPCRA - Emergency Planning and Community Right-to-Know Act****CERCLA Reportable Quantity**

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
potassium hydroxide	1310-58-3	1000	*

*: Calculated RQ exceeds reasonably attainable upper limit.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Acute Health Hazard

SARA 302 : SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

California Prop 65 This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other reproductive harm.

The components of this product are reported in the following inventories:

TSCA On TSCA Inventory
DSL This product contains one or several components that are not on the

SAFETY DATA SHEET



BCL TIRE & ENGINE CLNR 5GL

Version 1.4

Revision Date 03/05/2015

Print Date 11/14/2016

AICS	Canadian DSL nor NDSL.
NZIoC	Not in compliance with the inventory
PICCS	Not in compliance with the inventory
IECSC	Not in compliance with the inventory

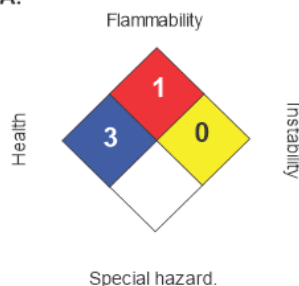
Inventory Acronym and Validity Area Legend:

AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TSCA (USA)

SECTION 16. OTHER INFORMATION

Further information

NFPA:



HMIS III:

HEALTH	3
FLAMMABILITY	1
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

OSHA GHS Label Information:

Hazard pictograms



Signal word

Hazard statements

Precautionary statements

Danger:
Causes severe skin burns and eye damage.

Prevention: Wash skin thoroughly after handling. Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting. IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower. IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician. Wash contaminated clothing before reuse.
Storage: Store locked up.
Disposal: Dispose of contents/container in accordance with local regulation.

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind. The information in this document applies to this specific material as supplied. It may not be valid for this material if it is used in combination with any other materials. Users should make their own investigations to determine the suitability and applicability of the information for their particular purposes.

SAFETY DATA SHEET

**BCL TIRE & ENGINE CLNR 5GL**

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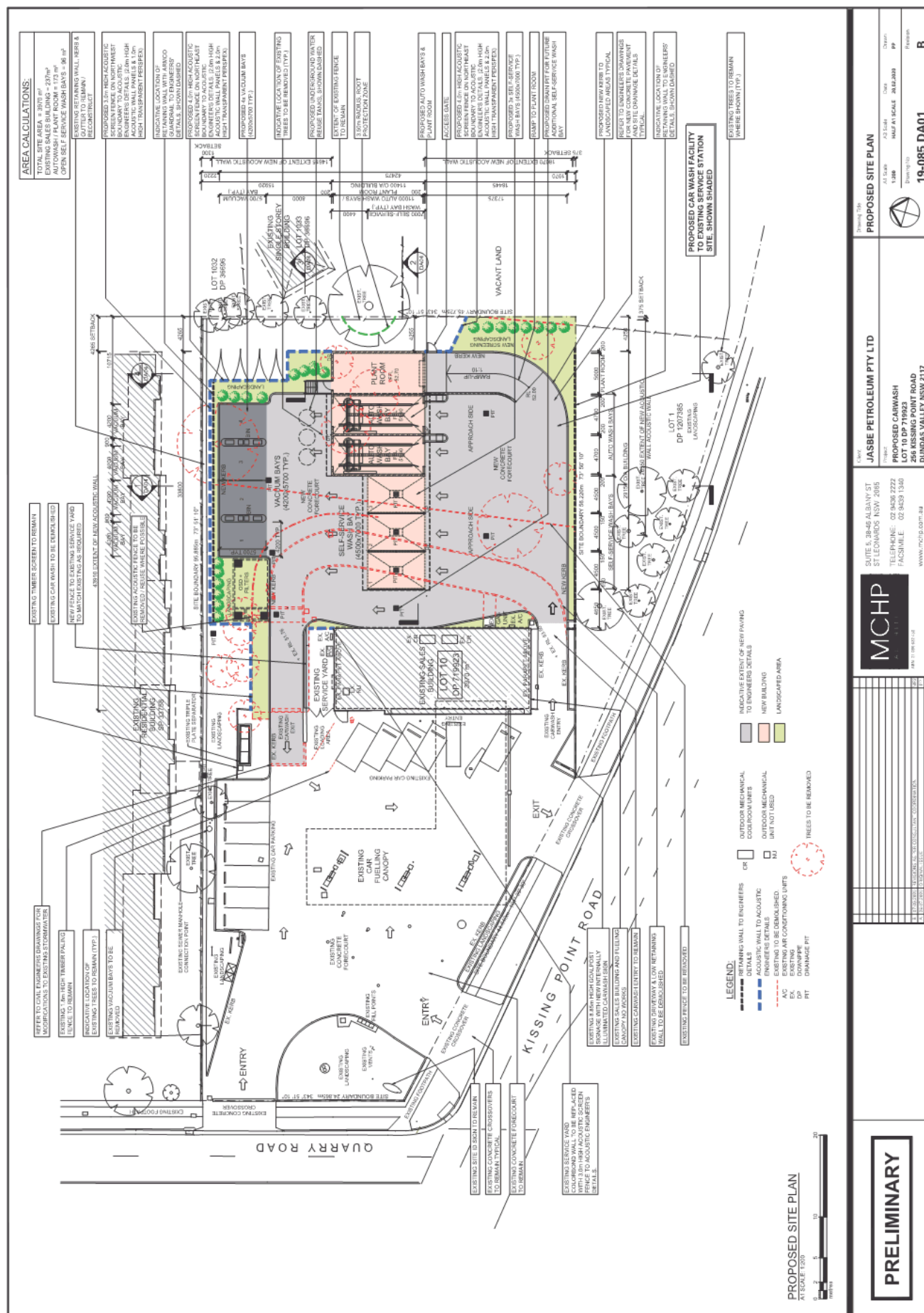
Revision Date 03/05/2015

Print Date 11/14/2016

This SDS has been prepared by the Compliance Services organization supporting this manufacturer, supplier or distributor.

Zep Inc. markets products under well recognized and established brand names such as Zep®, Zep Commercial®, Zep Professional®, Enforcer®, National Chemical™, Selig™, Misty®, Next Dimension™, Petro®, i-Chem®, TimeMist®, TimeWick™, MicrobeMax®, Country Vet®, Konk®, Original Bike Spirits®, Blue Coral®, Black Magic®, Rain-X®, Niagara National™, FC Forward Chemicals®, Rexodan®, Mykal™, and a number of private labeled brands.

Section F: Plans and Drawings
Drawing Set 1 - Carwash Layout Plan
Drawing Set 2 -Hydraulic Services Site Plan and Technical Drawings



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THE EXISTING SITE CONDITIONS SHOWN ON THE FOLLOWING DRAWINGS HAVE BEEN INVESTIGATED BY THE SURVEYOR SPECIFIED IN THE TITLE BLOCK.

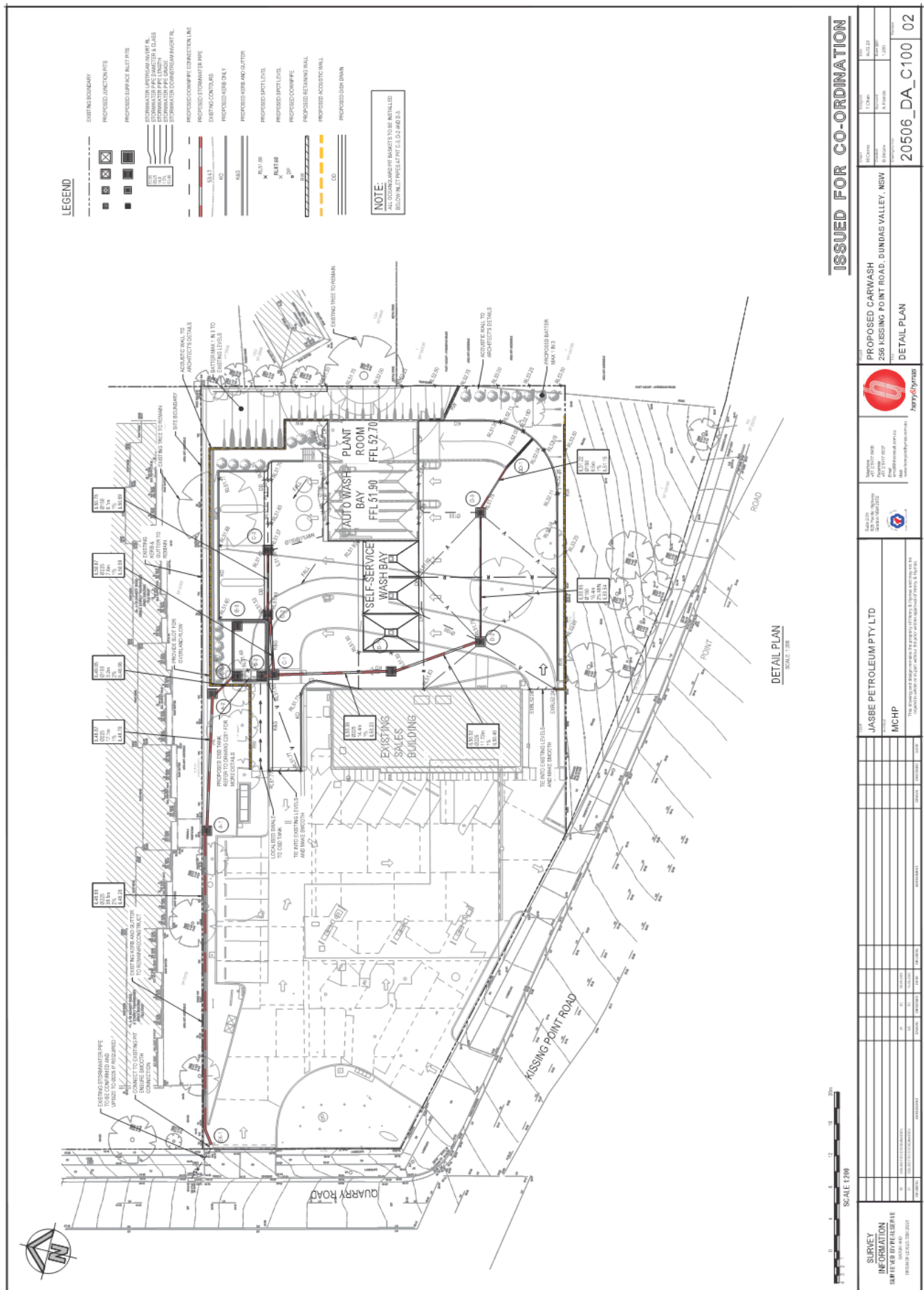
THE INFORMATION IS GIVEN TO PROVIDE A BASIS FOR DESIGN. HEARY AND WYMS PLY LTD. DOES NOT GUARANTEE THE ACCURACY OR COMPLETENESS OF THE SURVEY BASE OR ITS SUITABILITY AS A BASIS FOR CONSTRUCTION OR ASSESSMENT OF THE RISK OF COLLAPSE.

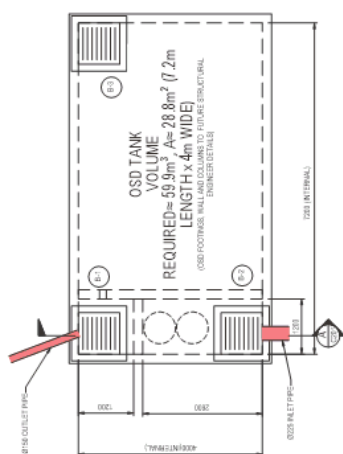
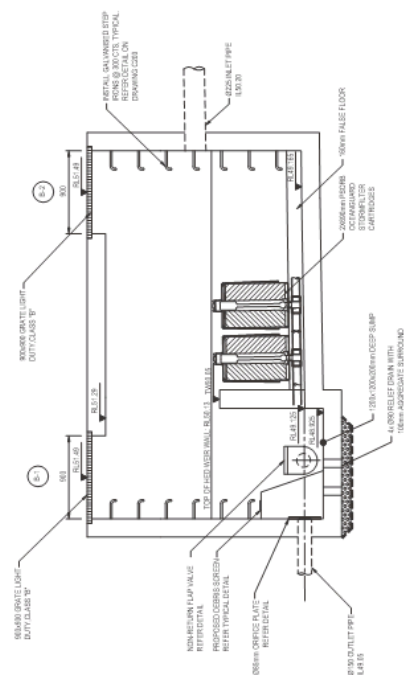
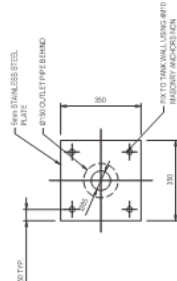
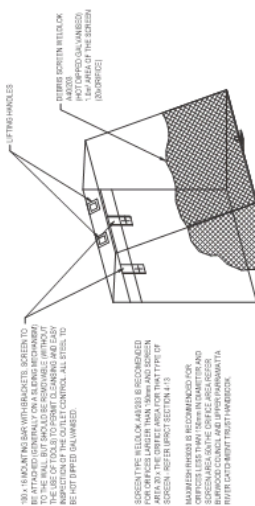
SOME DISCREPANCIES MAY BE ENCOUNTERED IN THE CONSTRUCTION BETWEEN THE SURVEY DATA AND ACTUAL FIELD DATA. CONTACT HEARY AND WYMS PLY LTD. THE FOLLOWING NOTES HAVE BEEN TAKEN DIRECTLY FROM ORIGINAL SURVEY DOCUMENTS.

20590 DA, C001	COVER SHEET, DRAWING SCHEDULE, NOTES AND LOCALITY SKETCH
20590 DA, C10	DETAIL PLAN
20590 DA, C20	STORMWATER MISCELLANEOUS DETAILS AND RPT. LOG SCHEDULE
20540 DA, C21	OSB DETAILS AND SECTION
20590 DA, C25	STORMWATER CATCHMENT PLAN
20540 DA, C30	SEWAGE AND FRESHWATER CONTROL PLAN
20590 DA, C35	SEWAGE AND FRESHWATER CONTROL DETAILS

SCALE: MT8

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OSD TANK PLAN
SCALE 1:20SECTION A-A
SCALE 1:25FLAP VALVE DETAIL
SCALE 1:50ORIFICE PLATE DETAIL
SCALE 1:50DEBRIS SCREEN DETAIL
ALL STEEL TO BE HOT DIPPED GALVANIZED

ALL CONFINED SPACE DANGER SIGN SHALL BE POSITIONED IN A LOCATION SUCH THAT IT IS CLEARLY VISIBLE TO PERSONS PROCEEDING INTO THE CONFINED SPACE.

BLIND FLOW MANIFOLD INFORMATION: SIGNA X 300mm INTERIOR LIFT GRATES MANHOLE

GLASS SIGN SHALL BE MANUFACTURED FROM POLYCARBONATE MATERIAL ON POLYPROPYLENE

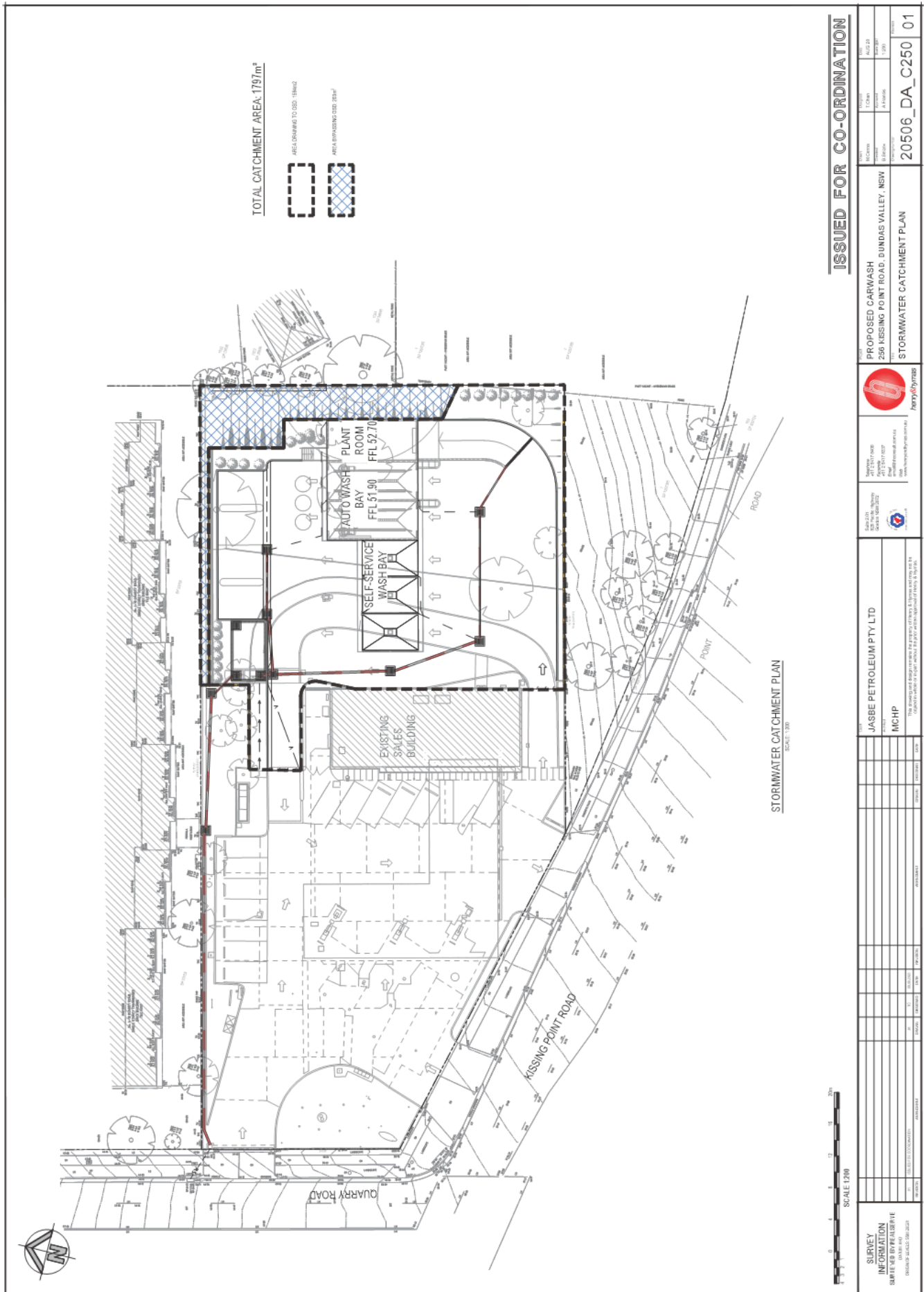
GLASS SIGN SHALL BE AFFIXED TO A SURFACE WITH EXPOSURE AT EACH CORNER

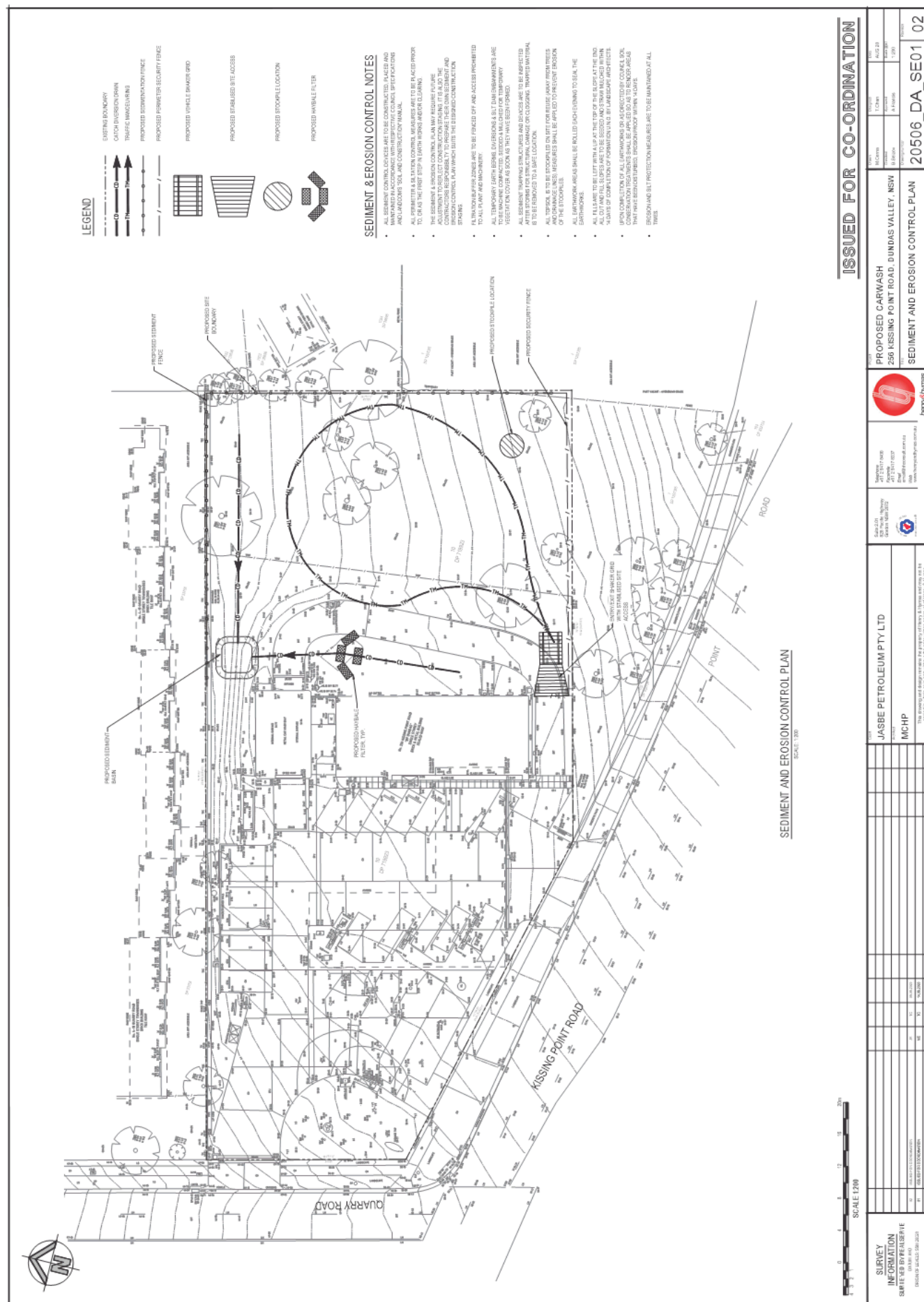
PRELIMINARY DESIGN:									
Site area:									[A]
Basic storage volume:									[B]
Area of site drained to storage:									[C]
Proportion of site stored:									[D]
Storage per ha of contributing area:									[E]
Adjusted PSD:									[F]
Final PSD:									[G]
DESIGN DCP:									
Maximum area draining to DCP:									[H]
Peak discharge to DCP:									[I]
Peak flow over weir to primary storage:									[J]
Width of weir:									[K]
Design flow over weir:									[L]
Height of flow over weir in DCP:									[M]
Maximum head to orifice crest:									[N]
Head for high early discharge (to weir crest):									[O]
Selected orifice diameter:									[P]
SCREEN DESIGN:									
Minimum screen area required (where orifice is <= 150mm):									[Q]
Minimum screen area required (where orifice is > 150mm):									[R]
Height of Screen (mm):									[S]
Minimum Width of Screen (where orifice is <= 150mm):									[T]
Actual Width of Screen:									[U]
Screen area provided:									[V]
REVISE SITE DISCHARGE:									
Maximum discharge:									[W]
High early discharge (HED):									[X]
Approximate mean discharge:									[Y]
Average discharge / ha:									[Z]
REVISE SITE STORAGE:									
Final storage volume per hectare:									[AA]
Determine final SSR:									[AB]
SITE STORAGE: (See Figure 5.2)									
Primary storage proportion:									[AC]
Secondary storage proportion:									[AD]
Tertiary storage proportion:									[AE]
Check storage:									[AF]

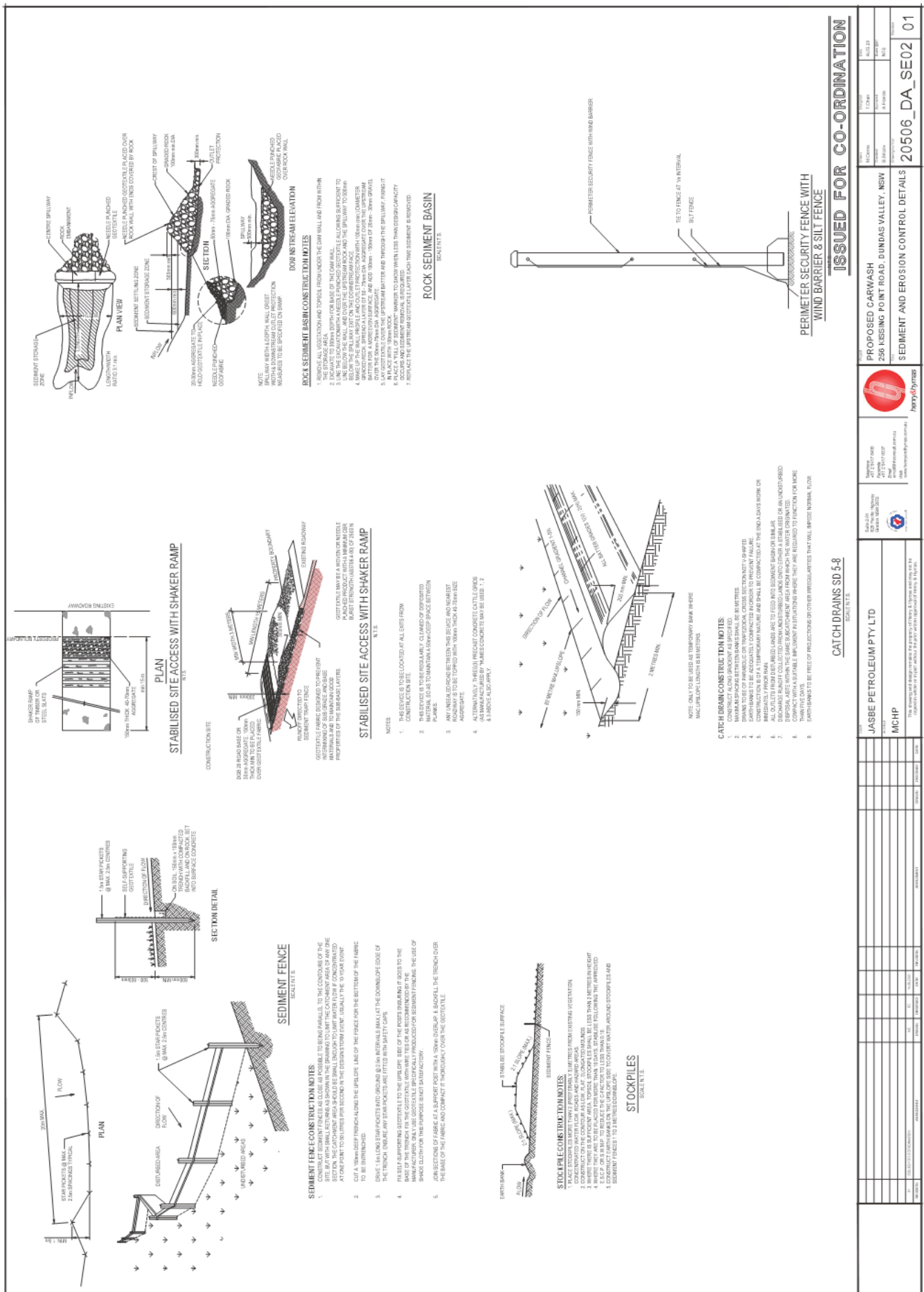


ISSUED FOR CO-ORDINATION

SURVEY INFORMATION	PROPOSED CARWASH				256 KESSING POINT ROAD, DUNDAS VALLEY, NSW				20506_DA_C201_02			
	OSD DETAILS AND SECTION				20506_DA_C201_02				20506_DA_C201_02			
JASBE PETROLEUM PTY LTD	JASBE PETROLEUM PTY LTD				JASBE PETROLEUM PTY LTD				JASBE PETROLEUM PTY LTD			
	JASBE PETROLEUM PTY LTD				JASBE PETROLEUM PTY LTD				JASBE PETROLEUM PTY LTD			
MCHP	MCHP				MCHP				MCHP			
	MCHP				MCHP				MCHP			







Section 6. Licenses / Authorizations
The Site licenses and permits are held digitally and can be accessed by site staff and corporate business units.

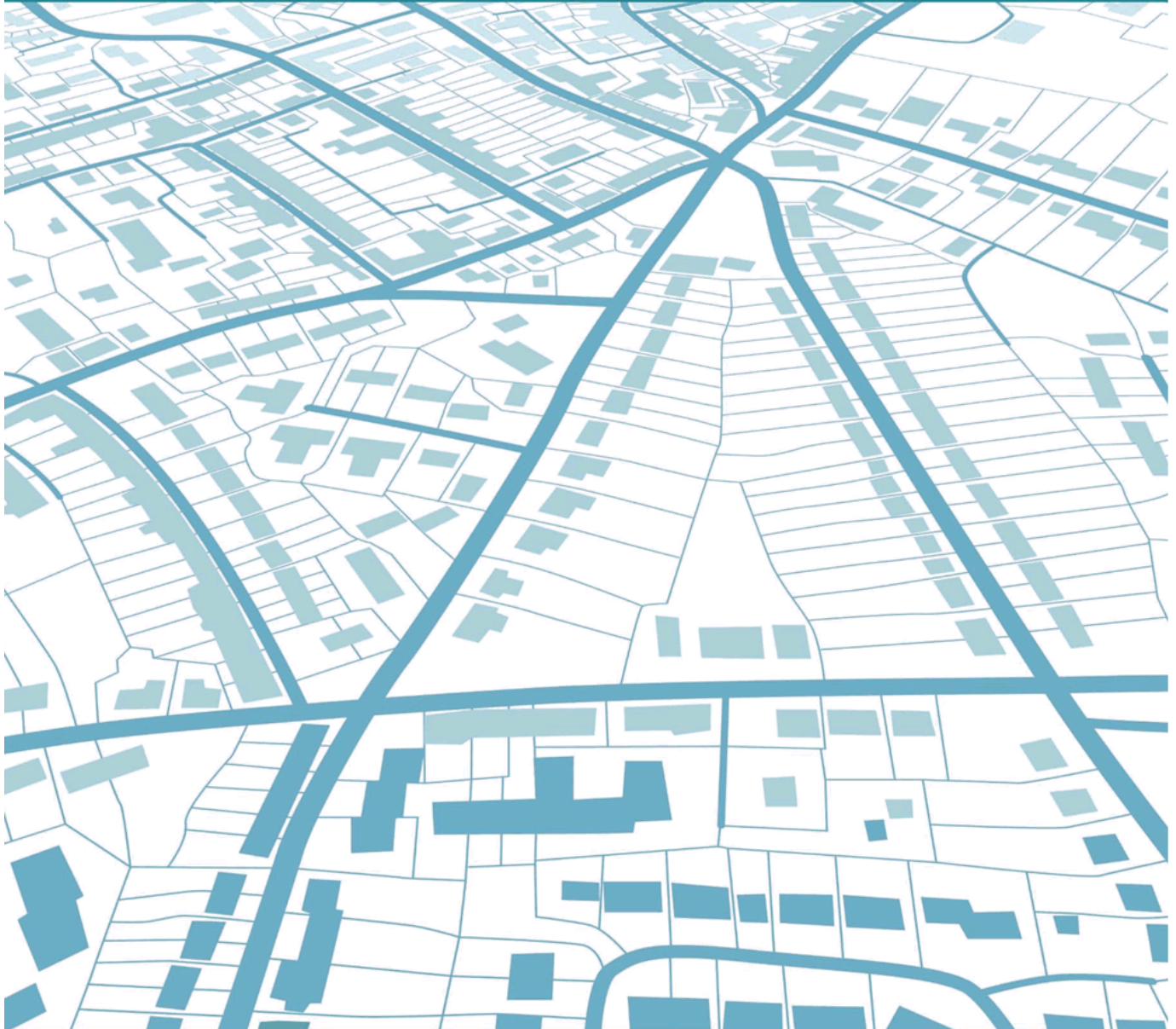
Section H. Abbreviations	
Abbreviations	
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ARA	Appropriate Regulatory Authority
BP	BP Australia Pty Ltd
EMP	Environmental Management Plan
HAZMAT	Hazardous Materials
HSSE	Health, Safety, Security and Environment
MSDS	Material Safety Data Sheets (MSDS)
N/A	Not Applicable
SES	State Emergency Service
NSW EPA	New South Wales Environment Protection Agency

CARWASH ENVIRONMENTAL MANAGEMENT PLAN				
Isobe Dundas Pty Ltd				
BP Dundas				
256 Kissing Point Rd				
DUNDAS VALLEY, NSW 2117				
This Carwash Environmental Management Plan (EMP) has been developed for the operation of a facility designed to undertake carwash activities at service stations. It provides an overview of the management of environmental risks to demonstrate that the activities being undertaken are acceptable and that there are appropriate controls in place to manage risks to the environment.				
Description of Activity				
BP Dundas (the Site) is a retail service station selling a range of petroleum products to the public. The Site operates 24 hours a day, seven days a week. A range of pre-packed auto parts are sold at the Site, along with a range of food items prepared by the onsite restaurant.				
The site operates a carwash facility, which is capable of washing passenger and other light vehicles.				
Environmental Objectives				
<ul style="list-style-type: none"> —To provide a means to identify site specific environmental issues and assess potential risk of these to the environment; —To identify the management strategies and mitigations to be implemented to minimise the risk of environmental harm; —To provide a mechanism to assist Isobe in complying with relevant environmental legislation and regulations. 				
Scope of the Document				
This Carwash Environmental Management Plan is limited to the carwash to be located at the service station facility.				
Contents				
Section A	Carwash Site Information			
Section B	Environmental Controls			
Section C	Incident and Emergency Management Procedures			
Section D	Maintenance Schedule			
Section E	Records			
Section F	Plans and Drawings			
Section G	Licences and Authorisations			
Section H	Abbreviations			
DOCUMENT NUMBER: P01004-009				
Revision	Author	Reviewed By	Revision Description	Revision Date
1	S Holland	P Morgan	Draft	16-Aug-21
Section A: Carwash Site Information				
A1. General Site Information				
Site Name	BP Dundas			
Site Street Address	256 Kissing Point Rd			
Site Suburb, State and Postcode	Dundas Valley NSW 2117			
Property Description	Operational BP branded service station and convenience store with carwash facilities.			
Site Contact Name and Number	Pramethilaj Jayathilagan 0415 041 058			
Zoning	R2 - Low Density Residential			
Access	24 hr site - via Retail Shop			
SECTION F: Refer to 'Figure 1: Carwash Layout Plan'				
A2. Site Contact Details				
Emergency Response Contacts *				
BP Australia Emergency Response (24/7)	1800 18 27 27			
TPA NSW	131 555			
SES NSW	132 500			
Indevstar Energy	02 9653 5141			
Sydney Water	131 140			
Itemera Gas Networks (NSW)	131 909			
National Poisons	131 126			
Fire and Rescue NSW	Triple Zero (000)			
Darug Custodian Aboriginal Corporation	0415 770 163			
SECTION C3: Refer to 'Emergency Contact Register'				
Responsible Employee for Environmental Management of Carwash				
Isobe NSW Operations Manager	MD Alamin 041383362 md.amin@isobe.com.au			
Store Manager	Pramethilaj Jayathilagan 0415 041 058			
Maintenance Contacts				
Backflow water valve checks	Equip Plumbing Solutions 0425 208 411			Annual
Carwash triple interceptor cleanout service	Cleanaway Waste Management Ltd 13 13 39			3 monthly (depending on volume) otherwise 6 monthly
Carwash General repairs & maintenance	Walfire Pty 1300 257 378			3 monthly
A3. Description of Current Infrastructure and Activities				
A3.0 Carwash Facility Description				
Automatic Car Wash has an inbuilt Reclamation System to recycle water within the system. Discharged wastewater from manual and automatic wash system is run through an Oil Interceptor. All manual and automatic wash bays have silt traps built into the entry of the drainage system for manual cleaning by maintenance contractors.				
The facility consists of two automatic carwash bays as well as 3 manual wash bays. Four vacuum bays will also form part of the facility.				
A3.1 Description of Current Chemical Storage for the Carwash Facility				
Product Type	Clean up requirements for Spills	GHS Classification	Usage	
AAP EXTREME SHINE WAX SGL	Contain spillage. Neutralise with chalk, alkali solution or ammonia and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations.	CLASS 3 PG 11	Vehicle Care – Wax	
AAP VELOCITY CLEAR COAT PROTECT SGL	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations. Keep in suitable, closed containers for disposal.	CATEGORY 4 CATEGORY 4 CATEGORY 1B CATEGORY 1 CATEGORY 1	Protective Coating	
BCL HI PH 3688 SGL	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations. Flush away traces with water. For large spills, dilute spilled material or otherwise contain material to ensure runoff does not reach a waterway.	CATEGORY 1	Pre-soak	
BLUE CORAL HI PH 3682	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations. Flush away traces with water. For large spills, dilute spilled material or otherwise contain material to ensure runoff does not reach a waterway.	CATEGORY 1	Pre-soak	
BCL PRESOAK LIME SGL	Keep in suitable, closed containers for disposal. Clean contaminated floors and objects thoroughly while observing environmental regulations.	CATEGORY 1, CATEGORY 1A	Pre-soak	
BCL SOLAWAY SGL	Neutralise with acid. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Keep in suitable, closed containers for disposal.	CATEGORY 1, CATEGORY 1A	Vehicle Soap	
BCL TIRE & ENGINE CLNR SGL	Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Sweep up or vacuum up spillage and collect in suitable container for disposal.	CATEGORY 1, CATEGORY 1A	Vehicle Tire & Engine Cleaner	
MA-3 SHAMPOO	Contain spillage, and then collect with non-combustible absorbent material (e.g. sand, earth, diatomaceous earth, vermiculite) and place in container for disposal according to local / national regulations.	CATEGORY 2A	Vehicle Soap	
SECTION F: Refer to 'Figure 1: Proposed Carwash Layout'				
SECTION B: Environmental Controls to Minimise or Eliminate Pollution Impacts				
B1. Environmental Aspects				
B1.0 Aspects & Impacts				
Aspect	Description of Control	Frequency of Control Inspection		
Waterway Pollution	Runoff is collected in the triple interceptor pit. Drain mats are used in the case of a spill from any product used in the carwash itself.	Daily		
Noise Control	The Carwash is permitted to operate 24 hours a day, 7 days a week. Signage will be mounted at the carwash site and vacuum bays encouraging users to keep noise to a minimum when using the facilities. Eg. Minimising loud music etc. Noise levels emanating from the premises must comply with the requirements of the NSW Environment Protection Authority's 'Protection of the Environment Operations (Noise Control) Regulation 2017'.	Daily		

CARWASH ENVIRONMENTAL MANAGEMENT PLAN				
Jasbe Dundas Pty Ltd BP Dundas				
Chemical Storage	Chemicals are to be stored within the Carwash Plant Room, located within the carwash facility itself.			Daily
Spill Clean-up/Response	A spill kit is located between the sales building (See Figure 2) and the Carwash. Drain mats are to be used immediately in the event of a spill and isolation of spill source is to occur immediately if safe to do so.			Daily
Light Pollution	Lighting and illuminated signage installed at the site is to be baffled and located at the facilities in a way that minimises adverse impacts from light pollution.			Daily
Odour	Odour emissions from the premises must be controlled so as not to cause a nuisance (as defined by the Public Health and Wellbeing Act, 2008)			Daily
B2. Staff Training				
Induction and training is provided to all Jasbe employees, with training requirements tailored to the nature of the work to be conducted. The general training requirements of all Jasbe staff are outlined below. All staff are required to undertake online training modules in i-Connect (online portal) and in-store modules using CIT book and fuel assessment forms. On completion of online and in-store training modules, all staff are required to complete Emergency Response Training. All training records are filed in-store and electronically in Jasbe data room.				
SECTION E1: Refer to 'Records Kept On-Site'				
Section C. Incident and Emergency Management Procedures				
In the case of an incident or emergency, Jasbe have a range of procedures and work instructions that document the risks, accountabilities and actions to be taken to manage incidents and emergency response situations.				
Key procedures are detailed below:				
Site Emergency RipChart: Emergency response to a range of incidents, including fuel spills, is outlined in this document. A copy is available onsite.				
MSDS: The Site has an MSDS file for all chemicals kept at the site. The file is located in the within the service station. The MSDS details the handling and emergency response procedures for specific products. It is intended that the MSDS set for the carwash is to be kept in its own folder within the building for ease of reference when required.				
Incident Reporting and Investigation Procedure: To ensure that all HSSE Events (Incidents, Near Misses and Unsafe Acts or Conditions) are reported and recorded, and where required are investigated so as to prevent the recurrence of similar incidents.				
C1. Fire or Explosion				
In the event of a fire or explosion, the Site has a Site Emergency RipChart to assist store staff in managing such incidents. As escalation system is in place to ensure appropriate support and resources can be allocated to manage the situation. There are fire extinguishers located at the Site, and they are identified on the site plan attached as the back of the on-site, hard copy Site Emergency RipChart.				
C2. Incident Reporting				
Incidents are reported using the H555 Incident Report Form - BP Branded Lower Safety Incident form.				
The Incident Form is completed by the staff member who encounter the incident, and then it is given to the Site Manager for further action.				
The Jasbe NSW Operations Manager is then notified of the incident so that an investigation can be carried out to rectify the incident and avoid future issues.				
C3. Emergency Contact Register				
Refer to A.2 for relevant Site Emergency Contacts and is the resource that site staff will use. Details of emergency service providers are re-iterated below:				
Emergency Type	Authority / Service Provider Name	Contact Person	Contact Number(s)	
Fire / Petroleum Spill	NSW Emergency Service	N/A	000	
LP Gas Leak	NSW Emergency Service	N/A	000	
Environmental Regulator or Appropriate Regulatory Authority (ARA)	NSW EPA	N/A	131 555	
Emergency Spill Advice	NSW EPA	NSW EPA Environmental Line	131 555	
Dangerous Goods	SafeWork NSW	Customer Service Centre - Notifiable Incident	131 090	
Water	Sydney Water	N/A	131 450	
Energy / Power	Endeavour Energy	N/A	02 9853 6141	
Gas	Tennesson NSW	N/A	131 909	
Carwash Facility Maintenance (Reactive and Preventative)	WashTec Pty Ltd	N/A	1800 257 378	
Triple Interceptor Pit Maintenance (Reactive and Preventative)	Cleanaway Waste Management Ltd	N/A	13 13 39	
Section D: Maintenance Schedule				
D1. Maintenance Schedule				
D101 Carwash Maintenance Schedule				
Details of Carwash maintenance items and scheduling:				
Equipment Description	Maintenance Frequency	Responsible Person	Contact	Contractor undertaking works
Carwash & Ancillary Facilities General Maintenance	Quarterly	Store Manager	02 9638 7085	WashTec Pty Ltd
Triple Interceptor Pit Maintenance	Quarterly (otherwise 6 monthly depending on rate of sediment accumulation)	Store Manager	02 9638 7085	Cleanaway Waste Management Ltd
D2. Inspection and Audit Program				
Details of the range of inspections and audits which the Site is subject to can be found below:				
Audit / Inspection	Frequency	Conducted By	Details	
Overall Site Checklist	Daily	Store Manager or Delegate	Inspections inside and outside of the store, including functionality and accessibility of site emergency response equipment, identification of carwash maintenance issues, checks of monitoring equipment and general cleanliness of the carwash work area.	
Safety Audit	Quarterly	Jasbe NSW Operations Manager	To observe, discuss, demonstrate and review critical safety at the site. It includes verification that the Overall Site Checklist has been adhered to and that all staff are up to date with training requirements.	
Environmental Compliance Audit	Biannually	Jasbe NSW Operations Manager	Environmental aspects of site operation are audited to verify compliance with regulatory requirements and environmental best practice.	
D3. Equipment Specifications				
Details of the manufacturer equipment specifications are detailed below:				
Document		Location		
WashTec Operating Instructions - Roll-over car wash system		Carwash Plant Room		
SoftCare® Pro Touchless / Pro Takt Type ST10/TM10 Version: 22.05.2018		Jasbe Data Room		
GrisSan Industries - Direct Drive System (Manual Wash Bays)				
Section E. Records				
E1. Records Kept On-Site				
Document		Location		
Site Emergency RipChart		At console for immediate access		
Staff Training Records				
Incident Report Form				
MSDS				
E2. Records Kept Off-Site				
Document		Location		
Dangerous Goods Notification		Jasbe data room		
Flammable and Combustible Goods License				
As Built Drawings				
Trade Waste Permit				
Waste Collection Contracts and Invoices				
UPSS Tank, Pipework and Equipment				
Aboveground Fuel Infrastructure				
Forecourt Pollution Control System Details				
Environmental Site Assessments, Well Installation Records and Validation Reports				
Groundwater Monitoring Events				
Maintenance and Calibration Records				
Fuel Stock Management Records				
Section F. Plans and Drawings				
Drawing Set 1 - Carwash Layout Plan				
Drawing Set 2 - Hydraulic Services Site Plan and Technical Drawings				
Section G. Licenses / Authorisations				
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Document Number: P001004-009
Revision Number: 1



“BP Dundas Valley”
Proposed Replacement Car Wash
Cnr Kissing Point Road & Quarry Road, Dundas Valley
Traffic and Parking Assessment

Ref: 20114
Date: September 2020
Issue: B

Transport and Traffic Planning Associates

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3.1	Road Network.....	4
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Figure 2	Site
Figure 3	Road Network
Figure 4	Traffic Control

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Appendix A	Development Plans
Appendix B	Turning Path Assessment

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1.0 Introduction

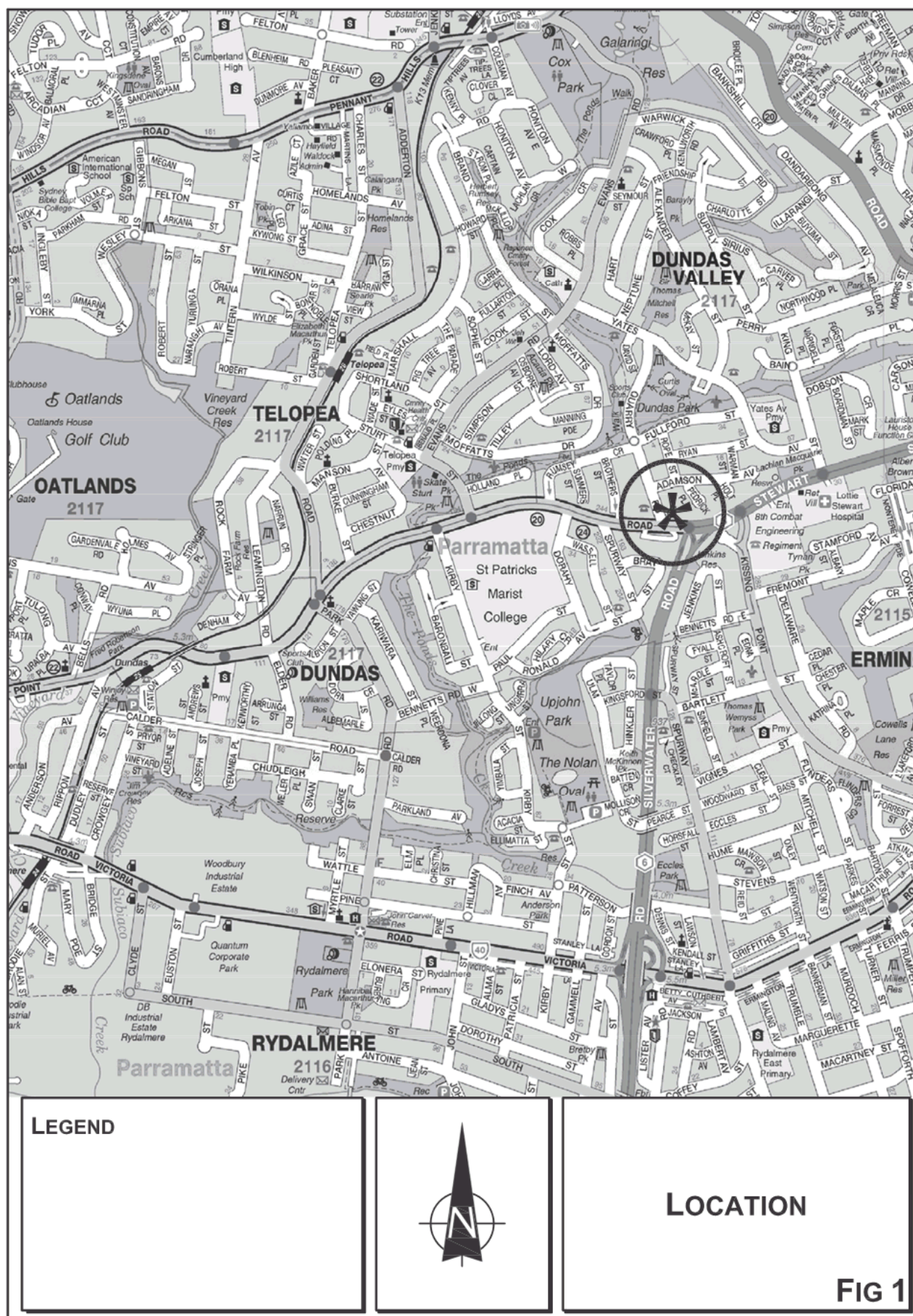
This report has been prepared to accompany a Development Application to Parramatta City Council for a proposed replacement car wash facility at the existing BP service station on Kissing Point Road at Dundas Valley (Figure 1).

The existing BP service station on Kissing Point Road occupies a large site with the service station/convenience store located in the central part with an automated “tunnel” car wash on the northern side of the building. The eastern part of the site is vacant with a few trees and it is proposed to provide a replacement new car wash facility on this part and remove the existing car wash.

The purpose of this report is to:

describe the site, its context and the proposed development scheme

- ❖ describe the existing road network and conditions on that network
- ❖ assess the adequacy of the proposed parking provision
- ❖ assess the potential traffic implications
- ❖ assess the proposed access, internal circulation and servicing arrangements



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2.0 Proposed Development Scheme

2.1 Site, Context, and Existing Circumstances

The site (Figure 2) is Lot 10 in DP 719923 being an irregular shaped area of 3,970m² with an extensive frontage to the northern side of Kissing Point Road and a much shorter frontage to the eastern side of Quarry Road.

The site is adjoined to the north by a medium density townhouse complex and to the east by part of Lachlan Macquarie Reserve. The surrounding area is largely single dwelling residential except for:

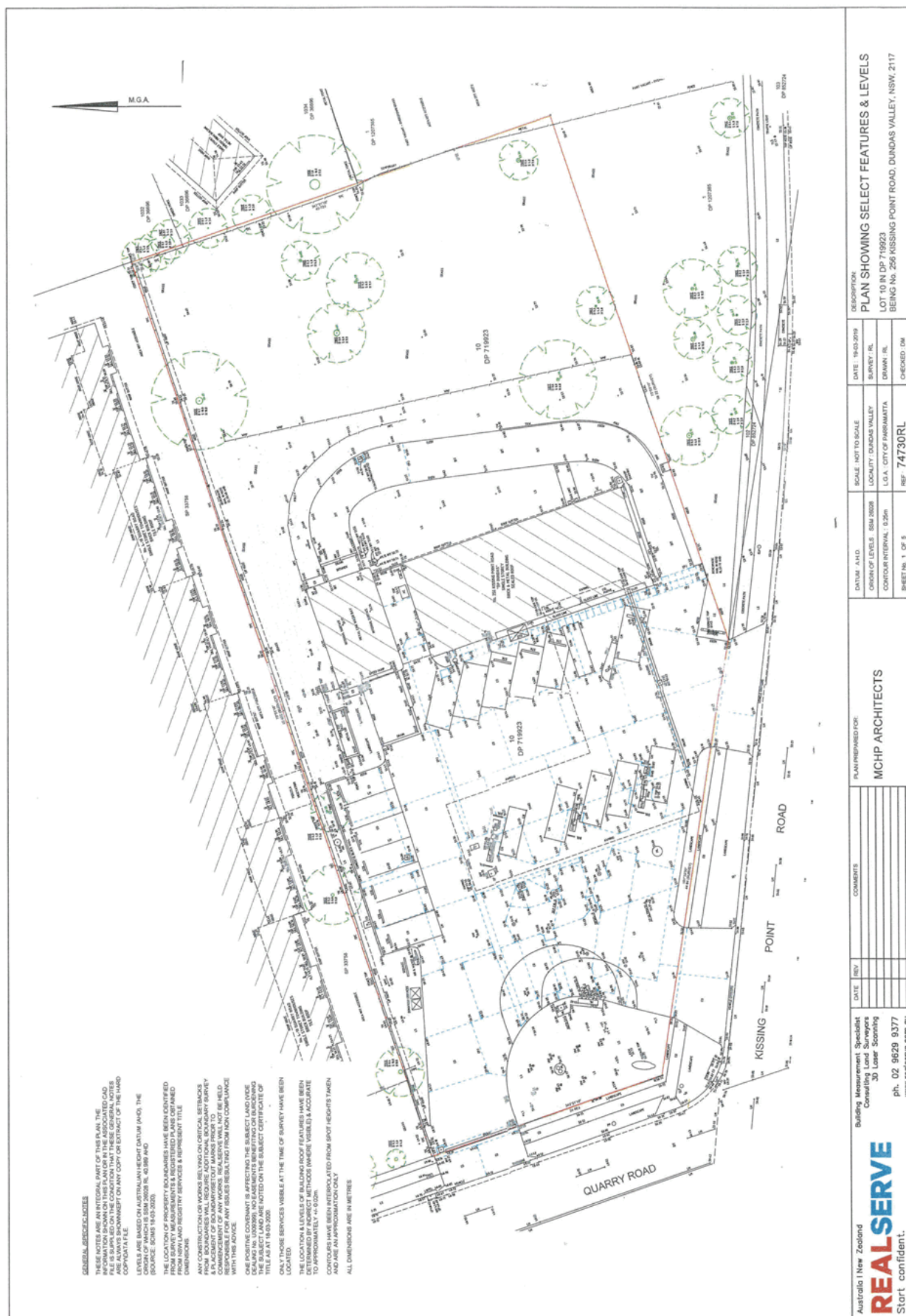
- ❖ an Army Engineering facility and retirement village on the northern side of Kissing Point Road
- ❖ the St Patricks Marist College to the southwest

The existing site circumstances comprises:

- ❖ the service station/convenience store building located in the centre
- ❖ the separate entry and exit driveways on Kissing Point Road and entry driveway on Quarry Road
- ❖ the six multi product fuel dispensers under a canopy on the western side of the building
- ❖ the tunnel car wash on the northern side of the building with access around the southern and eastern side
- ❖ the 11 parking spaces in front of the building and along the northern boundary

Details are provided on the survey plan overleaf.





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2.2 Proposed Development

It is proposed to demolish the existing car wash and clear/level the eastern part of the site.

Much of the eastern part of the site will be paved and a plant room constructed with 3 self-wash bays on the western side and 2 auto wash bays on the eastern side. There will be 4 vacuum bays along the northern boundary and ingress will be around the southern side of the service station building with egress on the northern side as at present.

Details are provided on the plans prepared by MCHP Architects which accompany the Development Application and are reproduced in part in Appendix A.

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3.0 Road Network and Traffic Conditions

3.1 Road Network

The road network serving the site (Figure 3) comprises:

- ❖ *Pennant Hills Road* – a State Road and arterial route which connects between Parramatta and Hornsby
- ❖ *James Ruse Drive* – a State Road and arterial route which connects between Parramatta Road and Windsor Road
- ❖ *Kissing Point Road* – a State Road and sub arterial route which connects between James Ruse Drive and Silverwater Road
- ❖ *Adderton Road* – a major collector road route running parallel to the railway line connecting between Kissing Point Road and Pennant Hills Road
- ❖ *Evans Road/Sturt Street and Yates Avenue/Murray Road* – minor collector roads serving the Dundas Valley area
- ❖ *Quarry Road* – a collector road which connects between Kissing Point Road and Yates Avenue

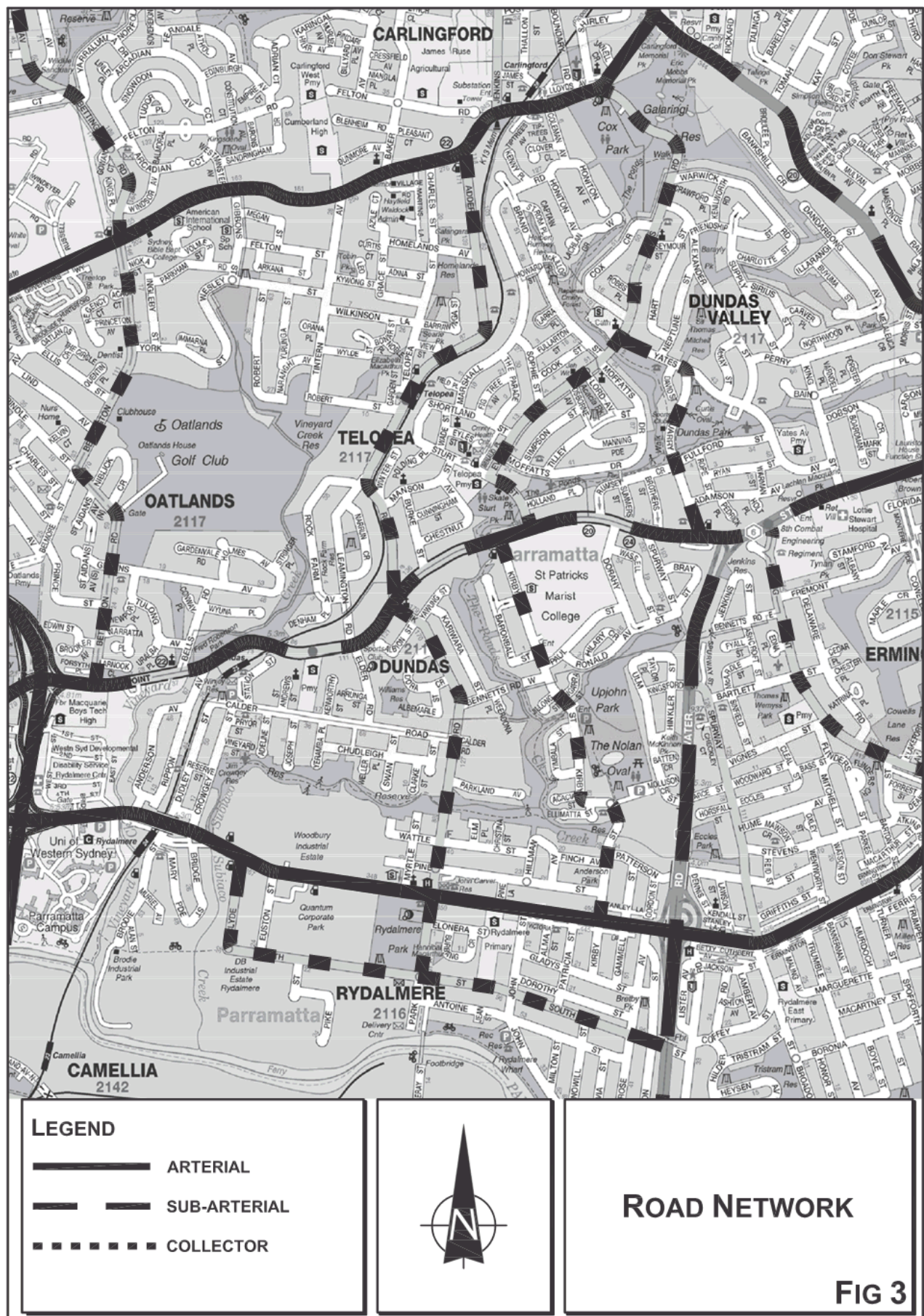
3.2 Traffic Controls

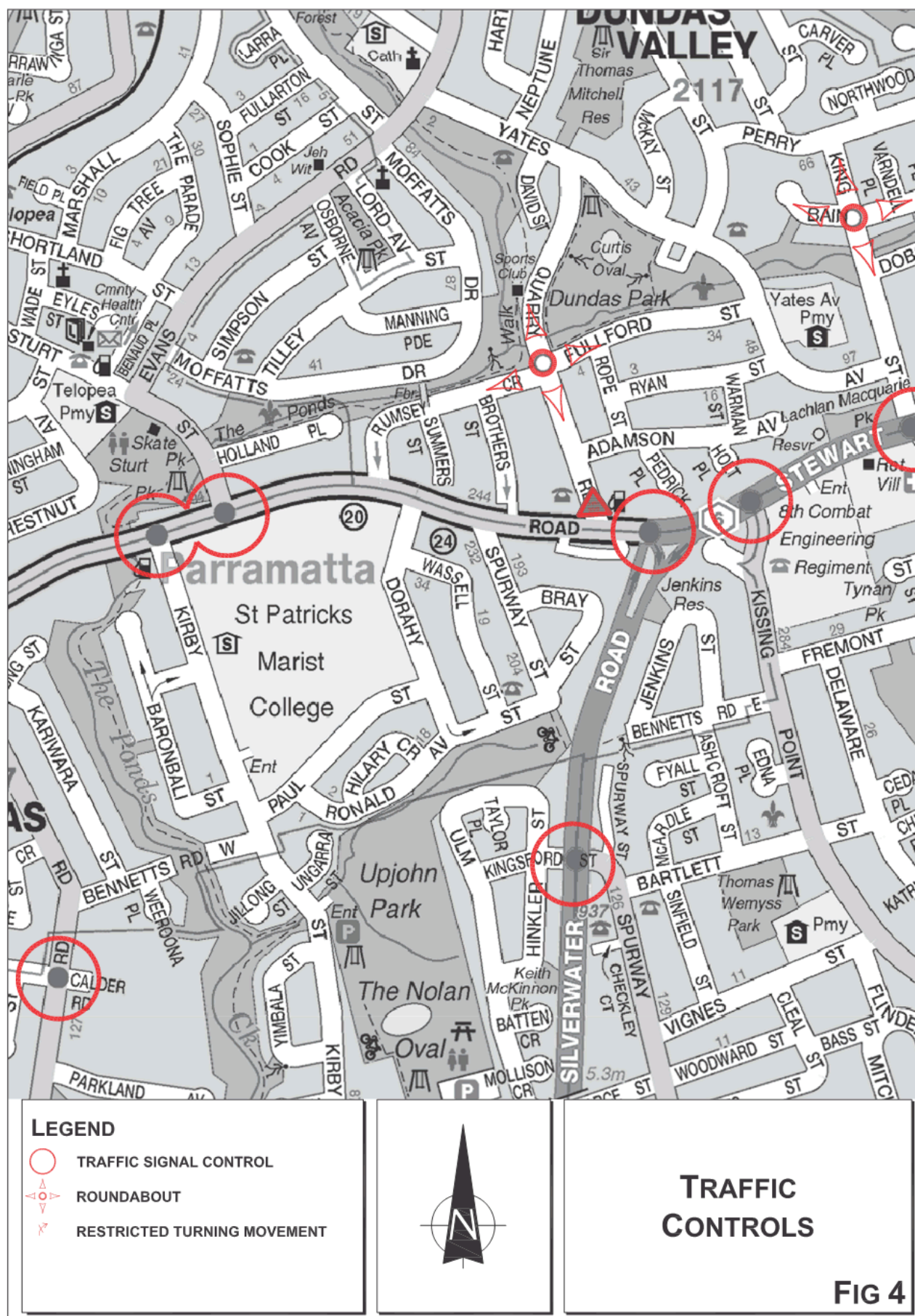
The traffic controls which have been applied to the road network in the vicinity of the school is described in Figure 4 and includes:

- ❖ the traffic signal control at the intersections of Silverwater Road and Kissing Point Road
- ❖ the central median island along Kissing Point Road with a gap at the Quarry Road intersection and right turn bay for the turn into Quarry Road
- ❖ the roundabout control at the intersection of Quarry Road and Fullford Street

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3.3 Traffic Conditions

An indication of traffic conditions on the road system serving the site is provided by data published by the TfNSW which is expressed in terms of average annual daily traffic (AADT) and the latest available data is as follows.

	AADT
Kissing Point Road East of Bourke Street	35,362
Silverwater Road South of Kissing Point Road	33,227

The traffic movements along Kissing Point Road past the site are generally some 3,000 vph two way in the AM and PM peak periods. Access to, from and across the arterial road system is facilitated by the traffic signals various intersections which also assist the right turn movement into Quarry Road and the egress out of the site.

3.4 Transport Services

Teloepa Railway Station (some 1.4Km to the north-west) provides access to regular train services while bus services operate along Kissing Point Road providing connections to Eastwood and Parramatta as well as the Metropolitan transport network. As a result, the site is considered to be well serviced by public transport.

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4.0 Parking

Parramatta City Council's Development Control Plan does not specify a parking required in relation to the proposed car wash while that contained in the TfNSW Development Guidelines does not relate to the type of car wash proposed.

Because of the proposed large hardstand area each of the 5 car wash elements will have an external queuing capacity of some 3 cars plus the cars in the wash bays and the cars in the 4 vacuum bays. It is quite apparent therefore that the "holding capacity" will be more than adequate to accommodate any peak car wash demand times (eg Saturday morning after a period of rainfall).

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5.0 Traffic

The TfNSW Development Guidelines do not contain any traffic generation criteria for car wash use however the Institute of Transport Engineers trip generation publication specifies the following:

Self Serve Car Wash

Weekday Network Peak – 5 wash Bays	4 to 8 vtpb per bay
Saturday Site Peak – 5 wash Bays	11 to 30 vtpb per bay

There is no indication of dual use (eg fuel, convenience store, car wash) however the ITE data for a service station with convenience store and car wash specifies the following (number of wash bays not specified):

6 Fueling Positions

Weekday AM Peak	65 vpth
Weekday PM Peak	80 vpth

Automatic washes are quicker than hand wash possibly 2 to 3 times faster, so if the existing car wash equates to 1 of the proposed automatic wash bays then the additional capacity in 3 hand wash bays and 1 automatic wash bays. It is reasonable to assume:

	Self Serve Bay	Automatic Bay
Weekday Network Peak	6 vtpb per Bay	12 vtpb per Bay
Saturday Site Peak	12 vtpb per Bay	24 vtpb per Bay

It is reasonable to assume that 30% of car wash customers also purchase fuel and or shop in the convenience store accordingly the potential worst case additional traffic generation as a result of the proposed development would be as follows:

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	3 Self Serve Bays	1 Automatic Bay	Total
Weekday Network Peak	+13 vtph	+9 vtph	21 vtph
Saturday Site Peak	+26 vtph	+16 vtph	42 vtph

This is a quite unlikely circumstance synonymous with say an accommodation hotel being at 100% capacity. However, it is a guide to a worst case circumstance with 21 additional cars per hour accessing the site on a Saturday and 10 during the weekday network peak although this would need to be discounted by the movements associated with the existing car wash facility.

It is apparent therefore that the proposed development will not result in any adverse traffic implications.

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6.0 Access, Internal Circulation and Servicing

Access

The design of the existing access driveways accords with the requirements of AS2890.1 and they are located where good sight distances are available particularly for egressing drivers.

Internal Circulation

The design provision for vehicles to circulate and enter/depart the wash bays are quite generous and will accommodate B99 cars, 4WD and vans.

Servicing

The minor amount of refuse produced by the car wash will be incorporated with the existing service station/convenience store refuse and will not require any additional refuse collection. Deliveries will be limited to cleaning products which will be accommodated in the large hardstand area.

Transport and Traffic Planning Associates

7.0 Conclusion

The proposed replacement car wash facility in the existing Dundas Valley BP service station will provide a service for motorists. The assessment of the potential traffic and parking implications of the development scheme has concluded that:

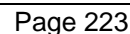
- ❖ the proposed vehicle arrangements and internal circulation arrangements will be suitable and appropriate
- ❖ there will not be any unsatisfactory traffic implications
- ❖ the proposed queuing provision will be adequate and appropriate

Transport and Traffic Planning Associates

Appendix A

Development Plans



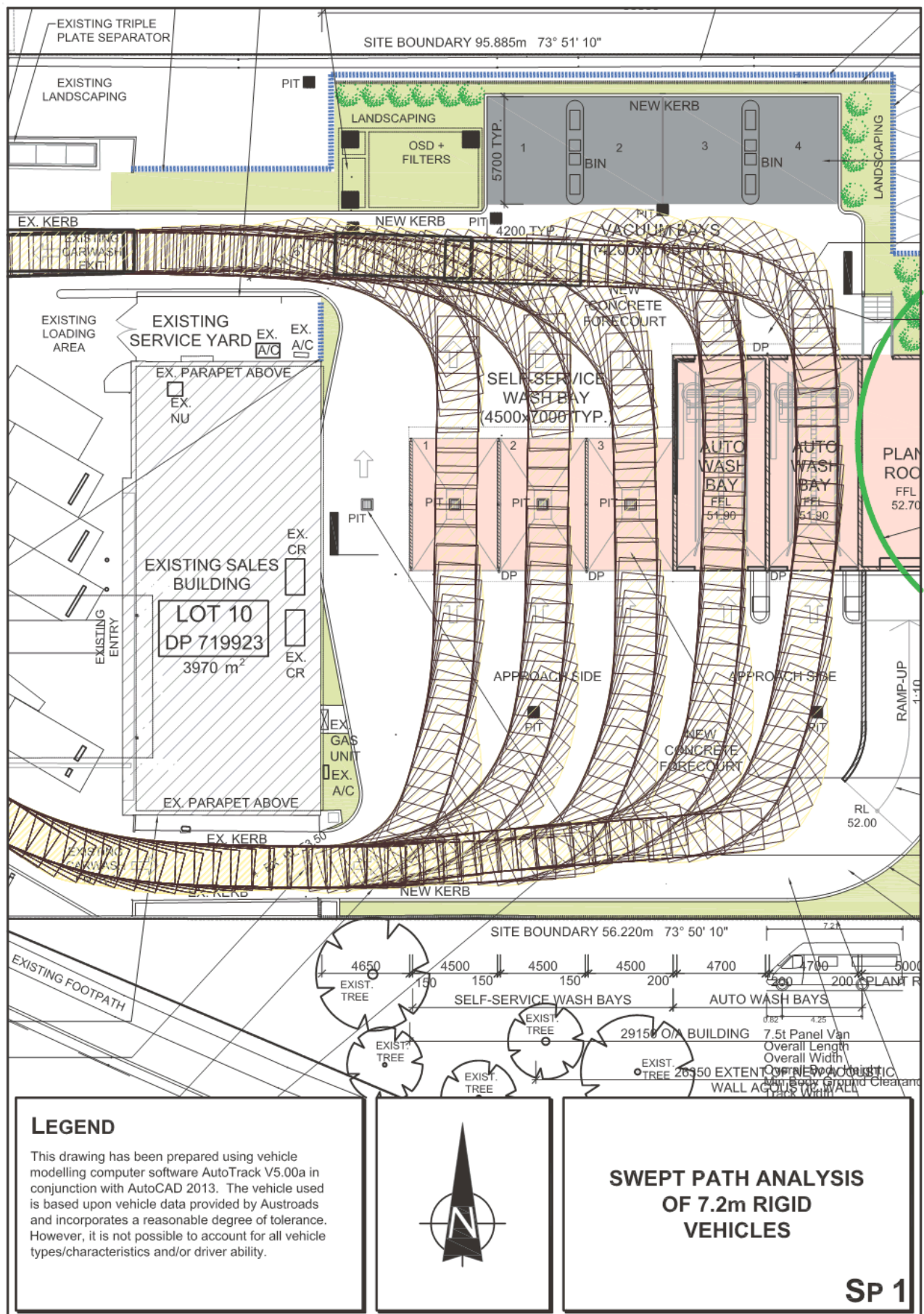


Transport and Traffic Planning Associates

Appendix B

Turning Path Assessment







Resolve Environmental Pty Ltd
144 Church Street
Brighton VIC 3186
Ph: (03) 9591 0173
info@resolveenvironmental.com.au
www.resolveenvironmental.com.au
ABN: 42 609 904 056

13 November 2020

The General Manager
City of Parramatta Council
PO Box 32,
PARRAMATTA NSW 2124

Document Reference: 001004-007

Dear Paul,

RE: BP Dundas Redevelopment – DL/912/2020 Information Issues Submission
256 Kissing Point Road, Dundas Valley NSW 2117

1 Introduction

Resolve Environmental Pty Ltd ('Resolve') was contacted by Jasbe Dundas Pty Ltd ('the client') to provide a submission to the Development Lodgement (DL) (ref: DL/912/2020) for redevelopment works at 256 Kissing Point Road, Dundas Valley NSW 2117 ('the site'). The City of Parramatta ('the Authority') provided the client with a response (dated 15 October 2020) on the lodgement by Jasbe. The response from the Authority is presented as **Attachment A**.

The response letter contains several directions that the client would be required to undertake and timeframes for completion. In particular, this submission addresses item 4, as follows:

" 4. Detailed Site Investigation – As advised in the Pre Lodgement Application advice provided for this proposal under PL/9/2020 a Detailed Site Investigation prepared by a suitably qualified consultant is to be submitted with the Development Application. The report should also include Remediation Action Plan. Site Validation Report will also be required as per requirements of SEPP55 and Contaminated Land Management Act."

This letter aims to address why the requirement for a Detailed Site Assessment (item 4) is considered to be onerous and not in general accordance with the guidance provided in State Environmental Planning Policy No. 55.

1.1 Guidance Documents

Documents reviewed in the preparation of this submission includes the following:

- Contaminated Land Management Act 1997;
- City of Parramatta, Contaminated Land Policy, dated 22 September 2014;
- Government of New South Wales, State Environmental Planning Policy No 55—Remediation of Land (current version for 17 April 2020 to date, accessed 23 October



2020); and

- Department of Urban Affairs and Planning (now Department of Planning and Infrastructure), Managing Land Contamination – Planning Guidelines SEPP 55—Remediation of Land (1998) (the ‘Guidelines’).

2 Proposed Development

The client has proposed the “*Demolition of existing carwash facility, construction of a new carwash facility. No proposed works to existing service station*”. Architectural plans of the proposed redevelopment are included as **Attachment B**.

The area of the proposed works is the eastern portion of the site (i.e. rear of existing shop building). The eastern portion of the site is currently undeveloped and includes established vegetation. No previous contaminating activities associated with the use of the site as a service station have been undertaken on the eastern portion of the site that is subject to the redevelopment. Aerial imagery of the site from 2003 confirms that the eastern portion has been undeveloped since this time. Imagery is presented in **Attachment C**.

No works are proposed to the existing service station, in particular the Underground Petroleum Storage Systems (UPSS) and fuel handling equipment, considered to be the potential source of contamination to the site. The UPSS layout is presented on **Figure 2, Attachment D**. The UPSS and fuel handling equipment are located at the western portion of the site. At its closest point, the UPSS (dispenser 1) is approximately 15m from the eastern extent of the proposed development (i.e. the existing carwash). Generally, the UPSS (i.e. dispenser 9) is approximately 30m from the proposed development (rear to the shop building).

3 Planning Decision

State Environmental Planning Policy No. 55 requires the issue of contamination be considered whenever a planning authority considers a development or rezoning proposal where the new use may increase risk to human or environmental health from contamination if it is present. The site land use, (i.e. service station), is listed on Table 1 of the Guidelines as an activity that may cause contamination. The proposed development of a car wash is not listed on Table 1 of the Guidelines.

Resolve understand that the planning decision (as outlined in Section 2.2, Figure 1, and Figure 2 of the Guidelines) to be made by the Authority is whether the land is suitable, or can be made suitable, for the proposed development.

Resolve has prepared the following information to support the Authority to make the planning decision.

3.1 Potential Sources of Contamination

To the knowledge of Resolve, the site of the proposed carwash does not currently nor has historically contained petroleum storage or handling equipment that may create a source of contamination. The eastern side of the property has been undeveloped and the proposed carwash is not considered to pose a risk to human or environmental health.

Potential sources of contamination by petroleum hydrocarbons at the site are considered to be



the current and historical UPSS, including remote filling points, fuel transfer lines, Underground Storage Tanks (USTs) and dispensing pumps presented on **Figure 2, Attachment D**. These sources of contamination are located on the western portion of the site.

Based on the sites history as a fuel distributor and review of previous assessments at the site, the site Contaminants of Potential Concern (CoPC) include petroleum hydrocarbons, characterised as: Total Recoverable Hydrocarbons (TRH); and BTEXN (Benzene, Toluene, Ethylbenzene, Xylenes and Naphthalene).

3.2 Site Environmental Condition

Groundwater has been monitored at the site in accordance with the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation (2019) via three groundwater monitoring wells. Historical data is available from March 2016 and shows a general decreasing trend of contaminants in groundwater. The most recent groundwater quality assessment conducted in April 2020 (presented as **Attachment D**) confirmed concentrations of petroleum hydrocarbons (TRH/BTEXN) were below the laboratory limit of detection and/or risk-based thresholds for all monitoring wells.

The anticipated groundwater flow direction is to the northwest towards The Ponds Creek, which is the closest surface water receptor, located 340m north of site. As such, the proposed carwash development is up-gradient of the UPSS (i.e. away from the direction of groundwater flow). Therefore, any contamination at the site as a result of the UPSS is likely to migrate in a north-easterly direction, away from the proposed carwash development.

Groundwater monitoring well MW01, located between the UPSS and the proposed carwash development site, was reported to have no hydrocarbons detected in groundwater above risk-based criteria. This confirms an absence of flow of any petroleum hydrocarbons in groundwater towards the proposed development.

Groundwater at the site was recorded between 0.9-2.3m below ground level. Given the shallow depth of groundwater, groundwater is considered to be in direct contact with the UPSS. As such, a detection of a leak or spill would be detected immediately, given the very close proximity of the groundwater wells to the UPSS, and the biannual frequency of testing.

3.3 Site Regulation History

Contamination is not currently or has formerly been regulated at this site by the EPA under the CLM Act.

3.4 Development Lodgement Application Requirements

The response from the Authority is presented as **Attachment A**. This includes the following requirement:

" 4. Detailed Site Investigation – As advised in the Pre Lodgement Application advice provided for this proposal under PL/9/2020 a Detailed Site Investigation prepared by a suitably qualified consultant is to be submitted with the Development Application. The report should also include Remediation Action Plan. Site Validation Report will also be required as per requirements of SEPP55 and Contaminated Land Management Act."



The eastern portion of the site where the proposed car wash development will be situated is undeveloped and includes established trees. This area of the site has not historically been associated with service station activities that would therefore warrant an intrusive investigation. No known sources of contamination are present in the proposed area of the car wash. The proposed development is not considered to pose a risk to human or environmental health.

Additionally, ongoing monitoring on the western portion of the site (down-hydraulic gradient of the proposed development) is undertaken with bi-annual groundwater monitoring. Groundwater at the site is shallow and in contact with the UPSS and therefore any spills/ leaks in the UPSS are expected to be observed in the groundwater monitoring. Recent groundwater results have shown that hydrocarbons have not been detected above risk based criteria, this includes results from monitoring wells located between the development area and the UPSS, further supporting that the proposed development site is not considered to be contaminated by UPSS activities occurring in the western portion of the site.

UPSS is located approximately 15m – 30m to the west of the proposed carwash. Therefore, any leaks/ spills from the UPSS are unlikely to migrate to the eastern portion of the site. Additionally, based on the shallow depth of groundwater, which is in direct contact with the UPSS, any spill/ leak would be detected in the groundwater monitoring. Recent results are below the adopted criteria and therefore do not support major contamination associated with leaks or spills.

Based on the location of the proposed carwash, the distance from UPSS and the results of ongoing groundwater monitoring, the requirement for a Detailed Site Investigation is considered to be onerous and not in accordance with the guidance provided in State Environmental Planning Policy No. 55 where the new use (carwash) may increase risk to human or environmental health from contamination if it is present. As the proposed carwash is located in an area of the site that is currently undeveloped, contamination is not considered to be present.

4 Conclusion

To summarise:

- To the knowledge of Resolve, the site of the proposed carwash (eastern portion of the site) does not currently nor has historically contained petroleum storage or handling equipment that may create a source of contamination. The site is currently undeveloped with established trees and is not considered to be a source of contamination
- Groundwater monitoring wells surrounding the potential sources of site contamination (i.e. UPSS), have reported concentrations of hydrocarbons below the laboratory limit of detection and/or all risk-based thresholds; and
- The proximity of the wells to the UPSS, positioning of wells in the direction of groundwater flow from UPSS and shallow depth of groundwater are such that any leak would likely be detected.
- Contamination is not currently or has formerly been regulated at this site by the EPA under the CLM Act.

As such, Resolve considers the proposed use will not increase risk to human or environmental health from contamination, as the likelihood of contamination present at the site is low.



Further, the carwash is not considered to be a contaminating activity that may pose a new source/pathway/receptor of contamination that may increase risk to human or environmental health in the current commercial setting. The proposed activity is not listed in Table 1 of State Environmental Planning Policy No. 55.

Resolve considers that the site is suitable for the proposed carwash redevelopment.

Resolve considers that the information detailed herein is sufficient to support the information provided by the client to the Authority and assist the Authority to make the planning decision.

Further, Resolve considers that a Detailed Site Investigation (including Remedial Action Plan) and Site Validation Report may no longer be required to assist the planning decision.

All conclusions and statements contained within this report are subject to **Section 6 – Limitations**.

5 Closing

Resolve would like to thank you for the opportunity to submit this letter and trust that it meets your requirements. Please do not hesitate to contact the undersigned on the contact details below if you have any questions related to the content, conclusions or any other matter.

Yours sincerely,

For Resolve Environmental Pty Ltd

A handwritten signature in blue ink, appearing to read 'Mitchell Knox'.

Mitchell Knox

Senior Environmental Scientist

M | 0438 049 685

E | mknox@resolveenvironmental.com.au

A handwritten signature in blue ink, appearing to read 'Jill McKendrick'.

Jill McKendrick

Certified Environmental Practitioner (CEnvP) No. 1313

Site Contamination Certification No. SC41131

M | 0437 591 111

E | jmckendrick@resolveenvironmental.com.au





6 Limitations

Resolve Environmental Pty Ltd (Resolve) has prepared this BP Dundas Redevelopment – DL/912/2020 Information Issues Submission (report) in accordance with generally accepted industry practices and standards prevailing at the time this report was prepared. In preparing this report, Resolve has applied the level of care and degree of skill ordinarily exercised by reputable members of the Environmental Consulting Profession in the preparation of environmental assessment and remediation reports.

This Report has been prepared for the exclusive use by Jasbe Dundas Pty Ltd.

The Report is made without any warranty by Resolve either express or implied.

Subsurface conditions including contaminant concentrations can vary significantly across a site and over time and as such, results, findings, and proposed works expressed in this Report may not represent the extremes of conditions at the site. Site conditions (including subsurface) may change over time and the conclusions in this Report, while accurate at the time of writing, may or may not be affected by such changes. Resolve confirms that Resolve takes no responsibility or liability for the accuracy or validity of third-party information, reports, correspondence and/or data referred to in this Report. This Report does not purport to provide legal advice.

This Report does not constitute a 'Preliminary Site Investigation' or 'Detailed Site Investigation' as set out in the National Environment Protection (Assessment of Site Contamination) Measure 2013 (NEPM) or any other regulation guideline by a Regulator, nor an 'Environmental Audit Report' under the meaning set out in any other regulation guideline by a Regulator.



Attachment A – Council Response



Our Reference: DL/912/2020
NSW Planning Portal Reference: PAN-40501
Telephone: 9806 5050

JASBE DUNDAS PTY LTD
SUITE 5 38-46 Albany Street
ST LEONARDS NSW 2065

15 October 2020

Dear Sir/Madam,

Application No.: DL/912/2020
Property: 256 Kissing Point Road, DUNDAS VALLEY NSW 2117
Description: Demolition of existing carwash facility, construction of a new carwash facility. No proposed works to existing service station.

I write in reference to your Development Lodgement (DL) Application for the above-mentioned address.

A preliminary check of this DL Application has been completed by a panel of senior staff to assess its suitability for lodgement as a Development Application (DA).

It has been determined that there is insufficient information to enable a full assessment of this application. Please address the issues identified below to enable lodgement as a Development Application:

Information & Merit Issues

1. Owner's Consent - The application has not been accompanied by correct owner's consent. As the property owner is a company, owner's consent is to be provided in two of the following ways:

Signatures of 2 directors or a director and a company secretary (unless it has a sole director).

Execution of owner's consent form (or other document to the same effect) in accordance with s 127 (1) of the Corporations Act 2001.

Common seal affixed to, and execution of, owner's consent form (or other document to the same effect) in accordance with s 127 (2) of the Corporations Act 2001. If there is no common seal, a company letterhead is acceptable.

Please refer to page 12 of the Development Application form.

2. Signage – if signage is proposed for the car wash as part of this Development Application then you are required to provide site and elevation plans of the sign/s and an assessment under SEPP 64 – Advertising and Signage in the SOEE.

Contact us:
council@cityofparramatta.nsw.gov.au | 02 9806 5050
@cityofparramatta | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | cityofparramatta.nsw.gov.au

3. Environmental Management Plan – As advised in the Pre Lodgement Application advice provided for this proposal under PL/9/2020 an Environmental Management Plan is to be submitted with the Development Application. The report should provide details how the activity will operate with regard to minimising or eliminating any potential pollution impacts posed by aspects of the activity such as water pollution, noise control, chemical storage and spill clean-up/response.
4. Detailed Site Investigation – As advised in the Pre Lodgement Application advice provided for this proposal under PL/9/2020 a Detailed Site Investigation prepared by a suitably qualified consultant is to be submitted with the Development Application. The report should also include Remediation Action Plan. Site Validation Report will also be required as per requirements of SEPP55 and Contaminated Land Management Act.

You have the option to book a complimentary Lodgement Advisory Meeting (LAM) to further discuss the issues outlined.

Please follow the below link to book a Lodgement Advisory Meeting.

<https://www.cityofparramatta.nsw.gov.au/business-development/my-development-application-da>

Due to the current situation with COVID-19, no face-to-face Lodgement Advisory Meetings are being held. Instead, we will call you to discuss and clarify the issues raised within this letter. If the issues relate to engineering/stormwater matters and you wish to book a LAM meeting, a conference call may be arranged with your consulting engineer. For all engineering/stormwater matters, your consulting engineer must be a part of the phone call for the issues to be discussed.

Proposals eligible for a Lodgement Advisory Meeting must fall within the below application types (where no flood and/or stormwater management issues present that require complex analysis):

- Dwelling additions/alterations;
- Single dwellings;
- Secondary dwellings;
- Dual Occupancy; and
- Small commercial Change of Use applications.

Lodgement Advisory Meetings are available on Monday, Thursday and Friday between 1.30pm-4.00pm and are booked in 30-minute timeslots. You may phone Customer Service on 9806 5050 to raise a Service Request for a Development Advisory Officer to contact you with a booking day/time.

Should your proposal fall outside of the above application types, a Pre-Lodgement Meeting should be arranged to discuss the issues raised.

Important Change to Lodgement Options

From 1 July 2020, all Development Applications are to be submitted through the NSW Planning Portal, planningportal.nsw.gov.au. The NSW Planning Portal is an efficient digital space where community, industry and government can work together to better understand and meet their obligations under the Environmental Planning and Assessment Act 1979.

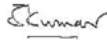
If using the NSW Planning Portal for the first time, you will need to start by registering for an account. After registering, you will be able to submit your Development Application by following the prompts and **all** documents/files will need to be uploaded using the Portal.

Please include a written response/letter demonstrating how the matters raised in this letter have been addressed in the revised proposal and/or associated documentation. When re-submitting your application via the NSW Planning Portal, please ensure you submit all application documents and not just those requested in this letter.

Additional Information Request via the NSW Planning Portal

If your lodgement has already been made via the NSW Planning Portal, you are only required to submit the additional information requested in this letter. When uploading revised files please include "AMENDED" or a version reference in the file name to allow staff to ascertain which documents are the latest versions. Please also provide a written response/letter demonstrating how the matters raised in this letter have been addressed in the revised documents and/or associated documentation.

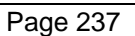
Yours sincerely,

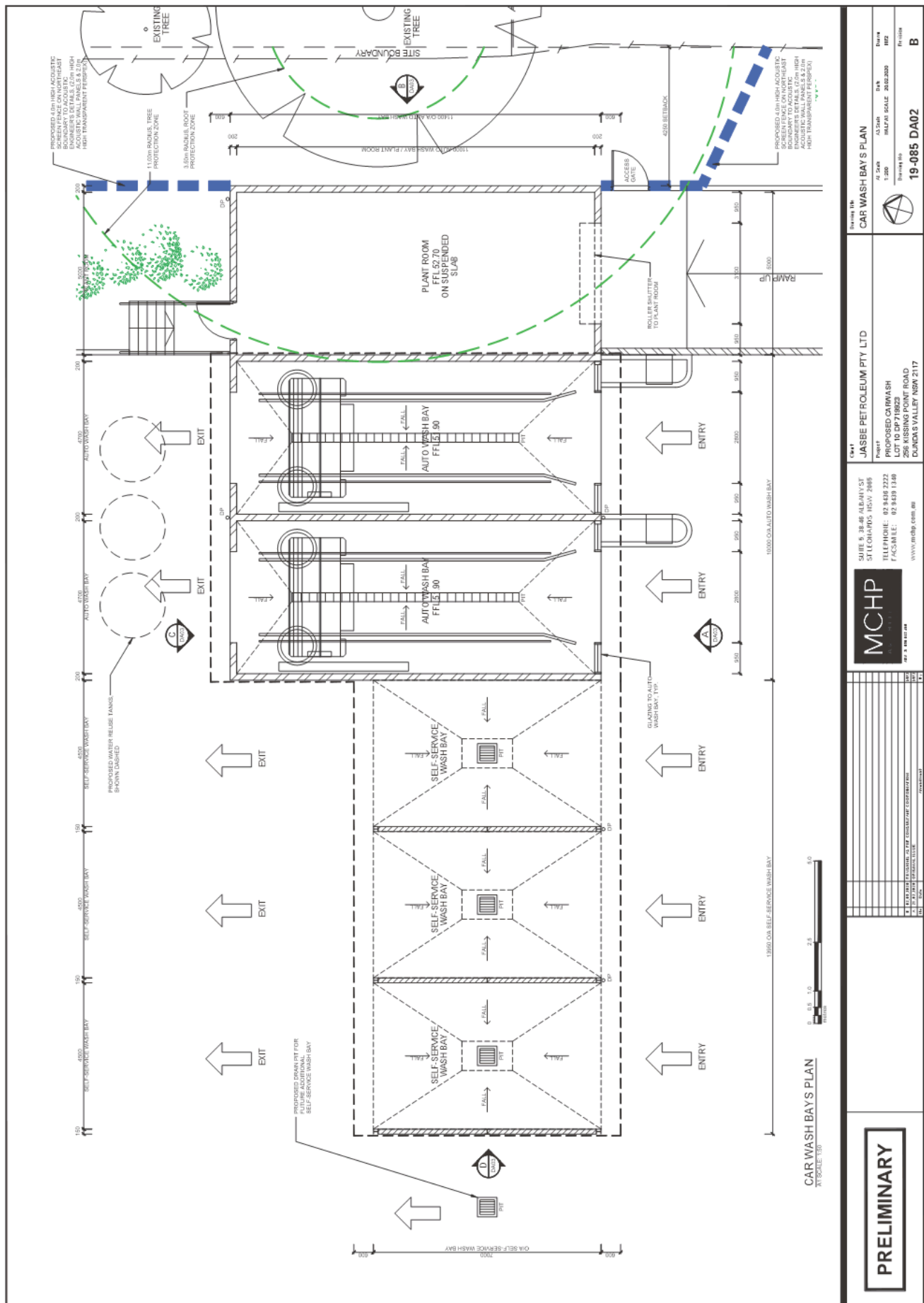


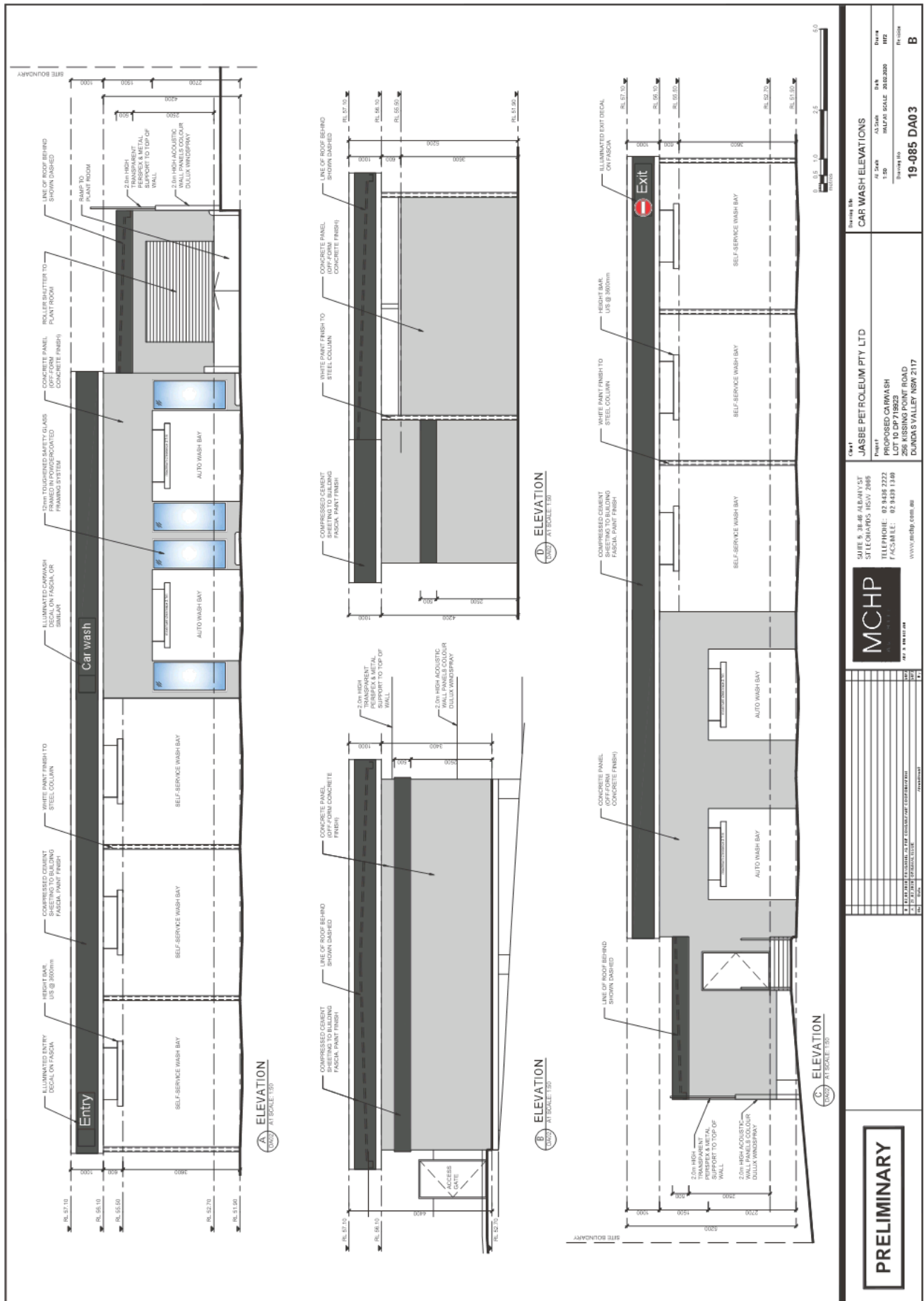
**Per: Development Assessment Services
Development & Traffic Services Unit**



Attachment B – Architectural Plan











Attachment C – Aerial Imagery



Image 1: Aerial Image 9 March 2003, 256 Kissing Point Road, Dundas Valley NSW 2117



Attachment D – Groundwater Monitoring Event (Resolve, 2020)

Groundwater Monitoring Event

Jasbe Dundas – April 2020

BP Dundas

256 Kissing Point Road

Dundas Valley, NSW



Introduction and Objective	
<p>Resolve Environmental Pty Ltd (Resolve) was commissioned by Jasbe Dundas Pty Ltd (Jasbe) to complete a Groundwater Monitoring Event (GME) at the BP branded service station located at on 256 Kissing Point Road, Dundas Valley (the site). The site location is presented on Figure 1, Appendix A.</p> <p>The GME was requested by Jasbe to ensure compliance with the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019.</p>	
Site Details	
Site Address	256 Kissing Point Road, Dundas Valley NSW 2117.
Monitoring Well Network	Three on-site groundwater monitoring wells (MW01, MW03 and MW04) and one tank-pit observation well (TPW01). The site features including the groundwater monitoring wells are presented on Figure 2, Appendix A .
Surrounding Land Use	<p>North – Residential properties adjacent, The Ponds Creek beyond.</p> <p>East – Vacant property with residential properties beyond.</p> <p>South – Kissing Point Rd, residential houses beyond.</p> <p>West – Quarry Rd, residential houses beyond.</p>
Surface Water Bodies	The nearest surface water body to the site is The Ponds Creek (approximately 340m North).
Inferred Groundwater Flow Direction	No inferred groundwater flow has been determined. Groundwater is anticipated to flow in a north westerly direction towards The Ponds Creek.
Field Work Summary	
Date of Field Work	30 April 2020.
Monitoring Wells Gauged	Three groundwater monitoring wells (MW01, MW03 and MW04) and one tank-pit observation well (TPW01) were gauged to establish depth to groundwater, total well depth, and to check for the presence of Light Non-Aqueous Phase Liquid (LNAPL).
Depth to Groundwater	The depth to groundwater ranged from 0.922 metres Below Top of Casing (BTOC) in MW01 to 2.320 m BTOC in MW03. Depth to water within the tank-pit was measured to be 0.560 casing BTOC in TPW01.
LNAPL Observations	LNAPL was not detected in any of the groundwater monitoring wells or tank pit wells.
Monitoring Wells Sampled	All groundwater monitoring wells were sampled.
Sampling Method	Hydrasleeve.
Visual Observations	Groundwater collected from MW01, MW03 and MW04 appeared clear.

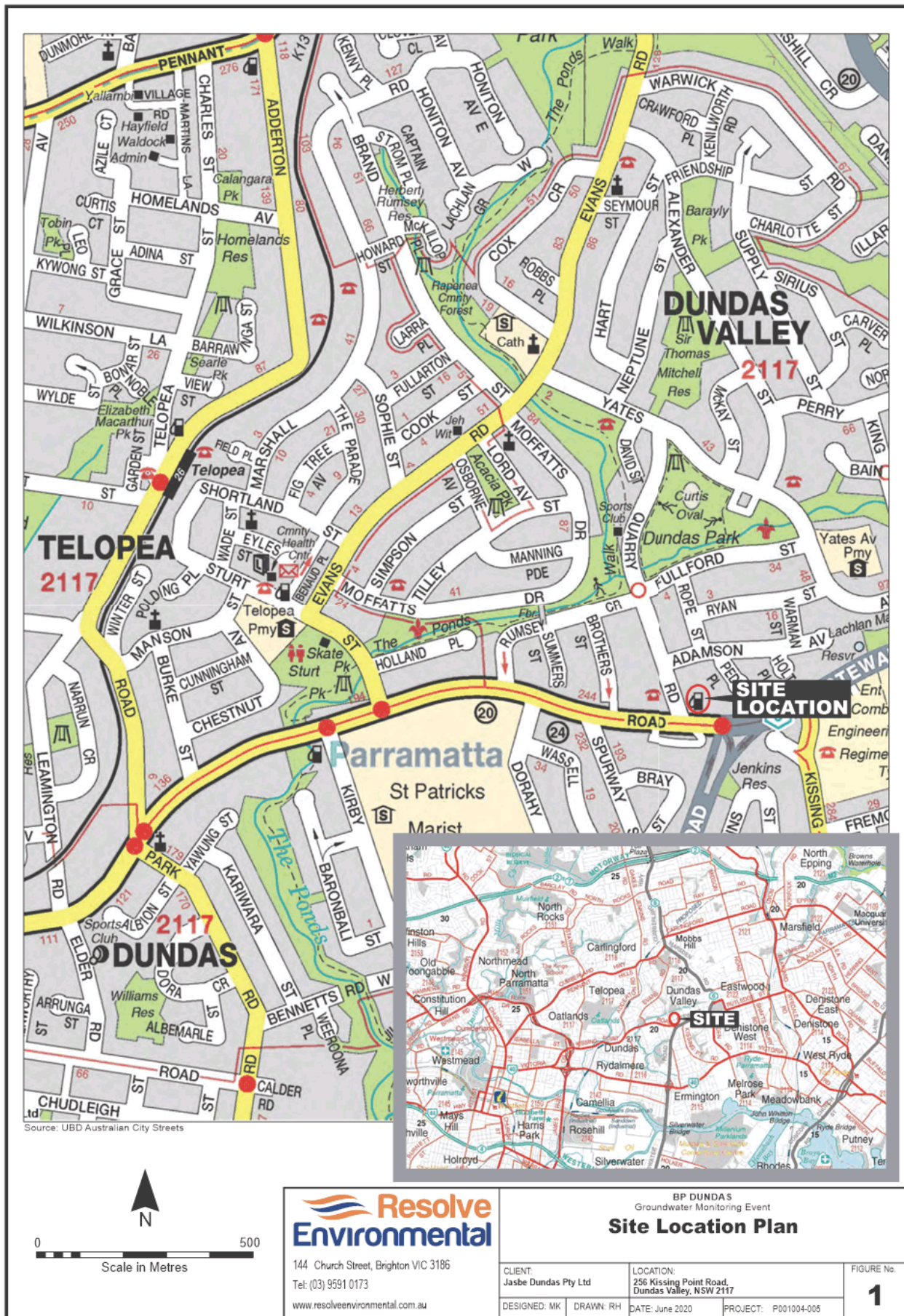


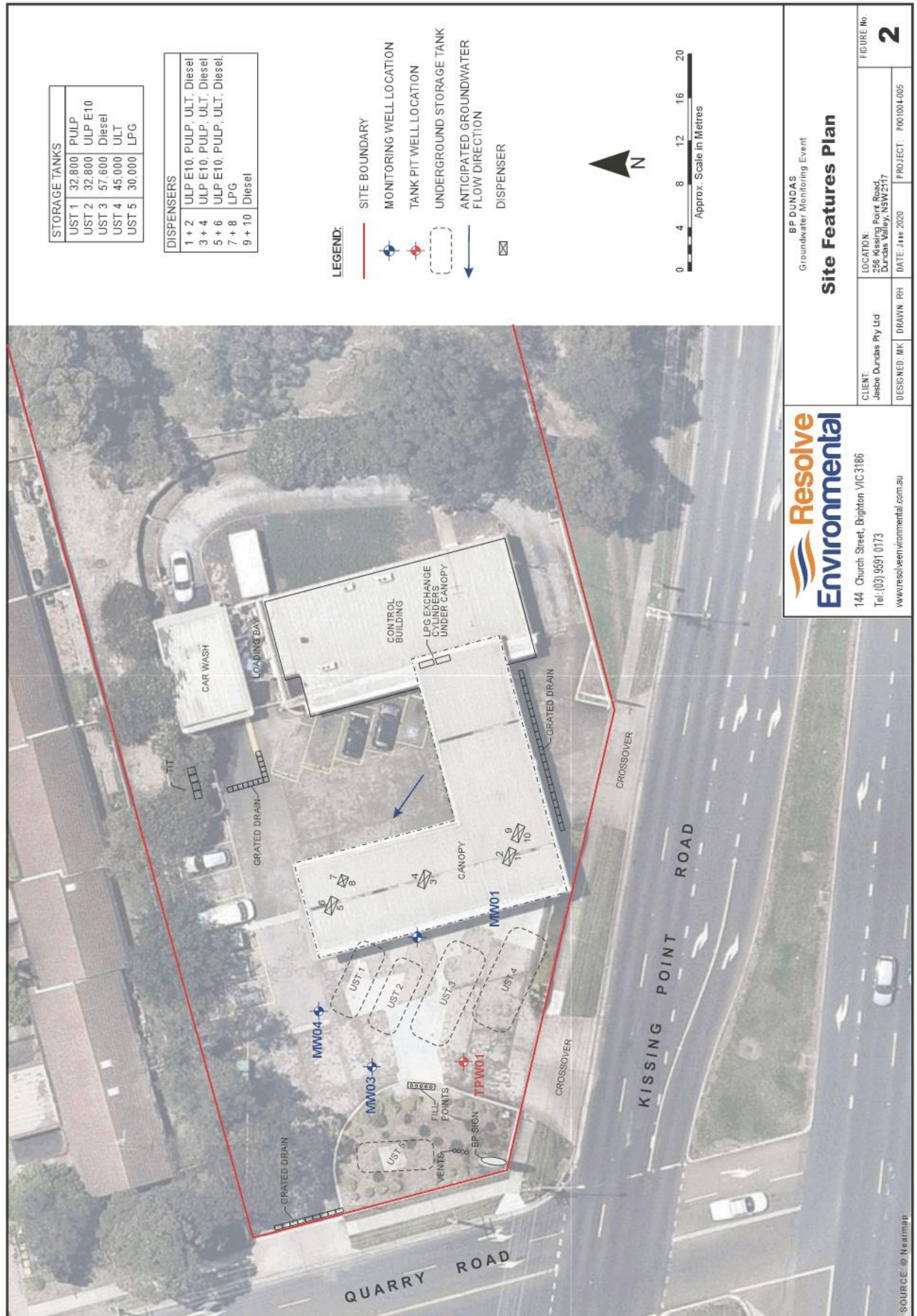
Groundwater Analytical Results						
Analysis Conducted	Groundwater samples were analysed for Total Recoverable Hydrocarbons (TRH) and Benzene, Toluene, Ethylbenzene, Xylenes and Naphthalene (BTEXN).					
Summary of Groundwater Results	<p>Tabulated groundwater results are provided in Table 1, Appendix B¹.</p> <p>The reported analytical results for TRH and BTEXN at MW01, MW03 and MW04 were below the respective Limits of Reporting (LOR) and/or the adopted screening criteria. Reported concentrations of TRH/BTEXN had generally decreased when compared to the historical data set.</p> <p>Laboratory Reports and Chain of Custody Documentation are provided in Appendix C.</p>					
Maximum Concentration (µg/L)	Analyte	Concentration	Well ID	Analyte	Concentration	Well ID
	F1	150	MW04	Benzene	<1	All
	F2	<100	All	Toluene	<2	All
	TRH C ₆ -C ₁₀	150	MW04	Ethylbenzene	<2	All
	TRH C ₁₀ -C ₁₆	<100	All	Xylene (total)	<2	All
	TRH C ₁₆ -C ₃₄	<100	All	Naphthalene	<5	All
	TRH C ₃₄ -C ₄₀	<100	All			
Conclusions						
<p>Based on the results of this GME, Resolve concludes the following:</p> <ul style="list-style-type: none"> • LNAPL was not identified in any of the monitoring wells or tank-pit well; • Concentrations of TRH and BTEXN were reported to be below the laboratory LOR and/or the adopted screening criteria at MW01, MW03 and MW04; and • Reported concentrations of TRH/BTEXN were generally consistent with those historically reported. 						

¹ Conservatively, Groundwater Investigation Levels (GILs) for all potential beneficial uses have been included as an assessment of the Conceptual Site Model (CSM) has not been made by Resolve



Appendix A – Figures







Appendix B – Table



Table 1
Groundwater Analytical Results
BP Dundas
256 Kiang Point Road, Dundas Valley, New South Wales

Well ID	Sample Date	Well Depth (mBODC)	ANALYTE	TOTAL RECOVERABLE HYDROCARBONS										BTEN				
				THI-C ₁₀	F1	THI-C ₁₀ -C ₁₆	F2	THI-C ₁₀ -C ₁₆	THI-C ₁₀ -C ₁₆	THI-C ₁₀ -C ₁₆	THI-C ₁₀ -C ₁₆	Benzene	Toluene	Ethylbenzene	m,p-xylene	ortho-xylene	Total Xylenes	Naphthalene
MM01	14 March 2016	0.646	ANZECC 2018: Fresh water 95% acetylation production ¹	-	-	-	-	-	-	-	-	950	180	80	200	350	-	16
	15 November 2016	1.005	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	23 November 2017	1.040	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 May 2018	1.164	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	26 November 2018	1.169	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 May 2019	1.152	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 October 2019	0.940	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	30 April 2020	0.922	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 March 2016	2.322	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	15 November 2016	2.814	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MM03	23 November 2017	2.700	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 May 2018	2.876	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	26 November 2018	2.648	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 May 2019	2.802	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 October 2019	2.277	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	30 April 2020	2.320	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 March 2016	1.727	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	15 November 2016	2.095	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	23 November 2017	1.201	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 May 2018	1.481	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MM04	26 November 2018	1.898	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 May 2019	1.769	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 October 2019	1.523	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	30 April 2020	1.511	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 March 2016	0.469	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	15 November 2016	0.596	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	23 November 2017	0.517	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	22 May 2018	0.519	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	26 November 2018	0.779	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 May 2019	0.667	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TP001	22 October 2019	0.466	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	30 April 2020	0.540	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	14 March 2016	0.466	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	15 November 2016	0.596	NIEHMC 2018: Drinking Water (health) ²	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes

All results in ug/L.
 "F1" denotes THI-C₁₀-C₁₆ fraction minus BTX as reported by the laboratory.
 "F2" denotes THI-C₁₀-C₁₆-C₂₀ fraction minus Naphthalene as reported by the laboratory.
 "mBODC" denotes metres below top of casing.
 "NL" denotes Not Limiting.

Bolding indicates a detectable concentration greater than the limit of reporting.

Highlighting indicates an exceedance of the corresponding criteria. Highlighting corresponds to the guideline with the highest criteria value where analytical result exceeds more than one guideline. In the absence of laboratory soil desorption data, conservatively the HSL derived for a sand based geology have been adopted.

Criteria

1. Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2018), default guideline value (GV) for benzene in fresh water: 85% Level of Protection
2. Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2018), default guideline value (GV) for benzene in fresh water: 85% Level of Protection
3. Guidelines for Managing Risks to Recreational Water (NIEHMC 2018) (Health / Aesthetic)
4. National Freshwater Protection (Assessment of Site Contamination) Measure 1999, updated 2013 (NIEHMC 2013).


Sources

Loughon O'Brien Field Services (2018). Groundwater Monitoring Event Report. BP Dundas Express, 256 Kiang Point Road, Dundas NSW 2117. 23 November 2017.



Appendix C – Laboratory Report and Chain of Custody Documentation

CHAIN OF CUSTODY				RELINQUISHED BY:		RECEIVED BY:			
ALS COC#: 10499 ALS Laboratory: ES Sydney CLIENT: RESOENV - RESOLVE ENVIRONMENTAL PTY LTD PROJECT: P001004-005 SITE: Dundas ORDER NO: PROJECT MANAGER: Mitchell Knox PRIMARY SAMPLER: Ryley Harrison EMAIL REPORTS TO: mknnox@resolveenvironmental.com.au, rharrison@resolveenvironmental.com.au EMAIL INVOICES TO:				DATE TIME: TURNOVER REQUIREMENTS: 5 Days Biohazard info:		8/5 RECEIVED BY: <i>M. Gould</i> DATE TIME: 4.5.2020 8am			
CONTACT PH: SAMPLER MOBILE: QUOTE NO: ME/885/18 V2 / EM2018RESOENV001 6				LABORATORY USE ONLY (Circle) Custody Seal intact? Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/> Ice / frozen ice bricks present upon receipt? Yes <input checked="" type="radio"/> No <input type="radio"/> N/A <input type="radio"/> Random Sample Temperature on Receipt: 9.1 °C Other comments:		RELINQUISHED BY: DATE TIME: RECEIVED BY: DATE TIME:			
SAMPLE DETAILS				ANALYSIS REQUIRED					
SAMPLE	NAME	DESCRIPTION	DATE / TIME	MATRIX	TOTAL BOTTLES	ON HOLD	GROUNDWATER	ALTERNATIVE ANALYSIS	ADDITIONAL INFORMATION
001	MM/01		30/04/2020 02:39 PM	Water	ALS: 3 Non ALS: 0	No	X		
002	MM/03		30/04/2020 02:40 PM	Water	ALS: 3 Non ALS: 0	No	X		
003	MM/04		30/04/2020 02:41 PM	Water	ALS: 3 Non ALS: 0	No	X		

Environmental Division
 Sydney
 Work Order Reference
ES2014745

 Telephone : + 61-2-8794 6565

Thursday, April 30, 2020 4:41:51 AM
 1 of 1

CHAIN OF CUSTODY				RELINQUISHED BY:		RECEIVED BY:	
ALS COC#: 10499 ALS Laboratory: ES Sydney CLIENT: RESOENV - RESOLVE ENVIRONMENTAL PTY LTD PROJECT: P001004-005 SITE: Dundas ORDER NO: PROJECT MANAGER: Mitchell Knox PRIMARY SAMPLER: Ryley Harrison EMAIL REPORTS TO: miknox@resolveenvironmental.com.au, rharrison@resolveenvironmental.com.au EMAIL INVOICES TO:				DATE TIME: TURNAROUND REQUIREMENTS: 5 Days Biohazard info:		RECEIVED BY: <i>Mykel</i> DATE TIME: 4.2.2020 8am	
CONTACT PH: SAMPLER MOBILE: 6 QUOTE NO: ME/885/18 V2 / EM2018RESOENV001				LABORATORY USE ONLY (Circle) Custody Seal intact? Yes No <input checked="" type="radio"/> N/A Fridge / frozen ice bricks present upon receipt? Yes No N/A Random Sample Temperature on Receipt: 1.9 °C Other comments:			
SAMPLE	SAMPLE NAME	BOTTLE NAME	VOLUME	BARCODE	TYPE	FILTERED	REASON
001	MMV01	Amber VOC Vial - Sulfuric Acid	40 mL	00160220045466	Purple	No	
001	MMV01	Amber VOC Vial - Sulfuric Acid	40 mL	00160220046019	Purple	No	
001	MMV01	Amber Glass Bottle - Unpreserved	100 mL	00400220001217	Orange	No	
002	MMV03	Amber VOC Vial - Sulfuric Acid	40 mL	00160220046013	Purple	No	
002	MMV03	Amber VOC Vial - Sulfuric Acid	40 mL	00160220046032	Purple	No	
002	MMV03	Amber Glass Bottle - Unpreserved	100 mL	00400220001210	Orange	No	
003	MMV04	Amber Glass Bottle - Unpreserved	100 mL	00400220001214	Orange	No	
003	MMV04	Amber VOC Vial - Sulfuric Acid	40 mL	00160220045752	Purple	No	
003	MMV04	Amber VOC Vial - Sulfuric Acid	40 mL	00160220045761	Purple	No	
Total Bottle Count: ALS: 9, Non ALS: 0							

Thursday, April 30, 2020

4:41:51 AM


Environmental

CERTIFICATE OF ANALYSIS

Work Order	: ES2014745	Page	: 1 of 4
Client	: RESOLVE ENVIRONMENTAL PTY LTD	Laboratory	: Environmental Division Sydney
Contact	: MITCHELL KNOX	Contact	: Shirley LeCornu
Address	: 144 Church Street BRIGHTON VICTORIA 3186	Address	: 277-289 Woodpark Road Smithfield NSW Australia 2164
Telephone	: -----	Telephone	: +6138549 9630
Project	: P001004-005	Date Samples Received	: 04-May-2020 08:00
Order number	: -	Date Analysis Commenced	: 06-May-2020
C-O-C number	: 10499	Issue Date	: 08-May-2020 10:41
Sampler	: RYLEY HARRISON		
Site	: Dundas		
Quote number	: ME/885/18 V2		
No. of samples received	: 3		
No. of samples analysed	: 3		



Accreditation No. 825
Accredited for compliance with
ISO/IEC 17025 - Testing

This report supersedes any previous report(s) with this reference. Results apply to the sample(s) as submitted. This document shall not be reproduced, except in full.

This Certificate of Analysis contains the following information:

- General Comments
- Analytical Results
- Surrogate Control Limits

Additional Information pertinent to this report will be found in the following separate attachments: Quality Control Report, QA/QC Compliance Assessment to assist with Quality Review and Sample Receipt Notification.

Signatories

This document has been electronically signed by the authorized signatories below. Electronic signing is carried out in compliance with procedures specified in 21 CFR Part 11.

Signatories	Position	Accreditation Category
Edwandy Fadjar	Organic Coordinator	Sydney Organics, Smithfield, NSW

RIGHT SOLUTIONS | RIGHT PARTNER



Page : 2 of 4
Work Order : ES2014745
Client : RESOLVE ENVIRONMENTAL PTY LTD
Project : P001004-005

General Comments

The analytical procedures used by ALS have been developed from established internationally recognised procedures such as those published by the USEPA, APHA, AS and NEPM. In house developed procedures are fully validated and are often at the client request.

Where moisture determination has been performed, results are reported on a dry weight basis.

Where a reported less than (<) result is higher than the LOR, this may be due to primary sample extract/digestate dilution and/or insufficient sample for analysis.

Where the LOR of a reported result differs from standard LOR, this may be due to high moisture content, insufficient sample (reduced weight employed) or matrix interference.

When sampling time information is not provided by the client, sampling dates are shown without a time component. In these instances, the time component has been assumed by the laboratory for processing purposes.

Where a result is required to meet compliance limits the associated uncertainty must be considered. Refer to the ALS Contact for details.

Key : CAS Number = CAS registry number from database maintained by Chemical Abstracts Services. The Chemical Abstracts Service is a division of the American Chemical Society.

LOR = Limit of reporting

^ = This result is computed from individual analyte detections at or above the level of reporting

Ø = ALS is not NATA accredited for these tests

~ = Indicates an estimated value.

Page : 3 of 4
 Work Order : ES2014745
 Client : RESOLVE ENVIRONMENTAL PTY LTD
 Project : P001004-005



Analytical Results

Sub-Matrix: WATER
 (Matrix: WATER)

Compound	CAS Number	Client sampling date / time	Client sample ID	Result			
				Unit	MMW01	MMW03	MMW04
					30-Apr-2020 14:39	30-Apr-2020 14:40	30-Apr-2020 14:41
					ES2014745-001	ES2014745-002	ES2014745-003
EP080/074: Total Petroleum Hydrocarbons							
C6 - C9 Fraction	----	20	µg/L	110		<20	170
C10 - C14 Fraction	----	50	µg/L	70		<50	<50
C15 - C28 Fraction	----	100	µg/L	<100		<100	<100
C29 - C36 Fraction	----	50	µg/L	<50		<50	<50
^ C10 - C36 Fraction (sum)	----	50	µg/L	70		<50	<50
EP080/074: Total Recoverable Hydrocarbons - NEPM 2013 Fractions							
C6 - C10 Fraction	C6_C10	20	µg/L	110		<20	150
^ C6 - C10 Fraction minus BTEX (F1)	C6_C10-BTEX	20	µg/L	110		<20	150
>C10 - C16 Fraction	----	100	µg/L	<100		<100	<100
>C16 - C34 Fraction	----	100	µg/L	<100		<100	<100
>C34 - C40 Fraction	----	100	µg/L	<100		<100	<100
^ >C10 - C40 Fraction (sum)	----	100	µg/L	<100		<100	<100
^ >C10 - C16 Fraction minus Naphthalene (F2)	----	100	µg/L	<100		<100	<100
EP080: BTEXN							
Benzene	71-43-2	1	µg/L	<1		<1	<1
Toluene	108-88-3	2	µg/L	<2		<2	<2
Ethylbenzene	100-41-4	2	µg/L	<2		<2	<2
meta- & para-Xylene	108-38-3 106-42-3	2	µg/L	<2		<2	<2
ortho-Xylene	95-47-6	2	µg/L	<2		<2	<2
^ Total Xylenes	----	2	µg/L	<2		<2	<2
^ Sum of BTEX	----	1	µg/L	<1		<1	<1
Naphthalene	91-20-3	5	µg/L	<5		<5	<5
EP080S: TPH(V)/BTEX Surrogates							
1,2-Dichloroethane-D4	17060-07-0	2	%	89.4		91.4	87.1
Toluene-D8	2037-26-5	2	%	105		106	105
4-Bromofluorobenzene	460-00-4	2	%	102		104	101



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Work Order : ES2014745
Client : RESOLVE ENVIRONMENTAL PTY LTD
Project : P001004-005

Surrogate Control Limits

Sub-Matrix: WATER		Recovery Limits (%)	
Compound	CAS Number	Low	High
EP080S: TPH(V)/BTEX Surrogates			
1,2-Dichloroethane-D4	17060-07-0	71	137
Toluene-D8	2037-26-5	79	131
4-Bromofluorobenzene	460-00-4	70	128


Environmental

QUALITY CONTROL REPORT

Work Order	: ES2014745	Page	: 1 of 4
Client	: RESOLVE ENVIRONMENTAL PTY LTD	Laboratory	: Environmental Division Sydney
Contact	: MITCHELL KNOX	Contact	: Shirley LeCornu
Address	: 144 Church Street BRIGHTON VICTORIA 3186	Address	: 277-289 Woodpark Road Smithfield NSW Australia 2164
Telephone	: -	Telephone	: +6138549 9630
Project	: P001004-005	Date Samples Received	: 04-May-2020
Order number	: -	Date Analysis Commenced	: 06-May-2020
C-O-C number	: 10499	Issue Date	: 08-May-2020
Sampler	: RYLEY HARRISON		
Site	: Dundas		
Quote number	: ME/885/18 V2		
No. of samples received	: 3		
No. of samples analysed	: 3		



Accreditation No. 825
Accredited for compliance with
ISO/IEC 17025 - Testing

This report supersedes any previous report(s) with this reference. Results apply to the sample(s) as submitted. This document shall not be reproduced, except in full.

This Quality Control Report contains the following information:

- Laboratory Duplicate (DUP) Report; Relative Percentage Difference (RPD) and Acceptance Limits
- Method Blank (MB) and Laboratory Control Spike (LCS) Report; Recovery and Acceptance Limits
- Matrix Spike (MS) Report; Recovery and Acceptance Limits

Signatories

This document has been electronically signed by the authorized signatories below. Electronic signing is carried out in compliance with procedures specified in 21 CFR Part 11.

Signatories	Position	Accreditation Category
Edwandy Fadjar	Organic Coordinator	Sydney Organics, Smithfield, NSW

RIGHT SOLUTIONS | RIGHT PARTNER



Page : 2 of 4
 Work Order : ES2014745
 Client : RESOLVE ENVIRONMENTAL PTY LTD
 Project : P001004-005

General Comments

The analytical procedures used by ALS have been developed from established internationally recognised procedures such as those published by the USEPA, APHA, AS and NEPM. In house developed procedures are fully validated and are often at the client request.

Where moisture determination has been performed, results are reported on a dry weight basis.

Where a reported less than (<) result is higher than the LOR, this may be due to primary sample extract/digestate dilution and/or insufficient sample for analysis. Where the LOR of a reported result differs from standard LOR, this may be due to high

Key : Anonymous = Refers to samples which are not specifically part of this work order but formed part of the QC process lot

CAS Number = CAS registry number from database maintained by Chemical Abstracts Services. The Chemical Abstracts Service is a division of the American Chemical Society.

LOR = Limit of reporting

RPD = Relative Percentage Difference

= Indicates failed QC

Laboratory Duplicate (DUP) Report

The quality control term Laboratory Duplicate refers to a randomly selected intra-laboratory split. Laboratory duplicates provide information regarding method precision and sample heterogeneity. The permitted ranges for the Relative Percent Deviation (RPD) of Laboratory Duplicates are specified in ALS Method QWI-EN/38 and are dependent on the magnitude of results in comparison to the level of reporting. Result < 10 times LOR. No Limit. Result between 10 and 20 times LOR: 0% - 50%; Result > 20 times LOR: 0% - 20%.

Sub-Matrix: WATER

Sub-Matrix: WATER			Laboratory Duplicate (DUP) Report									
Laboratory sample ID	Client's sample ID	Method: Compound	CAS Number	LOR	Unit	Original Res ult	Duplicate Res ult	RPD (%)	Recovery Limits (%)			
EP080/071 : Total Petroleum Hydrocarbons (QC Lot: 2999879)												
ES2014682-001	Anonymous	EP080: C6 - C9 Fraction	----	20	µg/L	<20	<20	0.00	No Limit			
ES2014857-001	Anonymous	EP080: C6 - C9 Fraction	----	20	µg/L	<20	<20	0.00	No Limit			
EP080/071 : Total Recoverable Hydrocarbons - NEPM2013 Fractions (QC Lot: 2999879)												
ES2014682-001	Anonymous	EP080: C6 - C10 Fraction	C6_C10	20	µg/L	<20	<20	0.00	No Limit			
ES2014857-001	Anonymous	EP080: C6 - C10 Fraction	C6_C10	20	µg/L	<20	<20	0.00	No Limit			
EP080: BTEXN (QC Lot: 2999879)												
ES2014682-001	Anonymous	EP080: Benzene	71-43-2	1	µg/L	<1	<1	0.00	No Limit			
		EP080: Toluene	108-88-3	2	µg/L	<2	<2	0.00	No Limit			
		EP080: Ethylbenzene	100-41-4	2	µg/L	<2	<2	0.00	No Limit			
		EP080: meta- & para-Xylene	108-38-3	2	µg/L	<2	<2	0.00	No Limit			
			106-42-3									
		EP080: ortho-Xylene	95-47-6	2	µg/L	<2	<2	0.00	No Limit			
		EP080: Naphthalene	91-20-3	5	µg/L	<5	<5	0.00	No Limit			
		EP080: Benzene	71-43-2	1	µg/L	<1	<1	0.00	No Limit			
		EP080: Toluene	108-88-3	2	µg/L	<2	<2	0.00	No Limit			
		EP080: Ethylbenzene	100-41-4	2	µg/L	<2	<2	0.00	No Limit			
ES2014857-001	Anonymous	EP080: meta- & para-Xylene	108-38-3	2	µg/L	<2	<2	0.00	No Limit			
			106-42-3									
		EP080: ortho-Xylene	95-47-6	2	µg/L	<2	<2	0.00	No Limit			
		EP080: Naphthalene	91-20-3	5	µg/L	<5	<5	0.00	No Limit			

Page : 3 of 4
 Work Order : ES2014745
 Client : RESOLVE ENVIRONMENTAL PTY LTD
 Project : P001004-005



Method Blank (MB) and Laboratory Control Spike (LCS) Report

The quality control term Method / Laboratory Blank refers to an analyte free matrix to which all reagents are added in the same volumes or proportions as used in standard sample preparation. The purpose of this QC parameter is to monitor potential laboratory contamination. The quality control term Laboratory Control Spike (LCS) refers to a certified reference material, or a known interference free matrix spiked with target analytes. The purpose of this QC parameter is to monitor method precision and accuracy independent of sample matrix. Dynamic Recovery Limits are based on statistical evaluation of processed LCS.

Sub-Matrix: **WATER**

Sub-Matrix: WATER	Method: Compound	CAS Number	LOR	Unit	Method Blank (MB) Report		Laboratory Control Spike (LCS) Report		
					Res ult	Spike Concentration	Spike Recovery (%)	LCS	Low
EP080/071: Total Petroleum Hydrocarbons (QCLot: 2999857)									
	EP071: C10 - C14 Fraction	----	50	µg/L	<50	400 µg/L	74.4	55.8	112
	EP071: C15 - C28 Fraction	----	100	µg/L	<100	600 µg/L	98.3	71.6	113
	EP071: C29 - C36 Fraction	----	50	µg/L	<50	400 µg/L	81.7	56.0	121
EP080/071: Total Petroleum Hydrocarbons (QCLot: 2999879)									
	EP080: C6 - C9 Fraction	----	20	µg/L	<20	260 µg/L	84.8	75.0	127
EP080/071: Total Recoverable Hydrocarbons - NEPM 2013 Fractions (QCLot: 2999857)									
	EP071: >C10 - C16 Fraction	----	100	µg/L	<100	500 µg/L	88.3	57.9	119
	EP071: >C16 - C34 Fraction	----	100	µg/L	<100	700 µg/L	99.0	62.5	110
	EP071: >C34 - C40 Fraction	----	100	µg/L	<100	300 µg/L	87.2	61.5	121
EP080/071: Total Recoverable Hydrocarbons - NEPM 2013 Fractions (QCLot: 2999879)									
	EP080: C6 - C10 Fraction	C6_C10	20	µg/L	<20	310 µg/L	86.3	75.0	127
EP080: BTEXN (QCLot: 2999879)									
	EP080: Benzene	71-43-2	1	µg/L	<1	10 µg/L	82.8	70.0	122
	EP080: Toluene	108-88-3	2	µg/L	<2	10 µg/L	87.5	69.0	123
	EP080: Ethylbenzene	100-41-4	2	µg/L	<2	10 µg/L	89.1	70.0	120
	EP080: meta- & para-Xylene	108-38-3 106-42-3	2	µg/L	<2	10 µg/L	89.3	69.0	121
	EP080: ortho-Xylene	95-47-6	2	µg/L	<2	10 µg/L	92.7	72.0	122
	EP080: Naphthalene	91-20-3	5	µg/L	<5	10 µg/L	96.7	70.0	120

Matrix Spike (MS) Report

The quality control term Matrix Spike (MS) refers to an intralaboratory split sample spiked with a representative set of target analytes. The purpose of this QC parameter is to monitor potential matrix effects on analyte recoveries. Static Recovery Limits as per laboratory Data Quality Objectives (DQOs). Ideal recovery ranges stated may be waived in the event of sample matrix interference.

Sub-Matrix: **WATER**

Analyte Recoveries: Data Recovery Limits as per Laboratory Data Accuracy Subject to (QCLot): Mean Recovery Range as stated in the Client or Sample Matrix Information.
 Sub-Matrix: **WATER**

Laboratory sample ID	Client's sample ID	Method: Compound	CAS Number	Matrix Spike (MS) Report			
				Spike Concentration	Spike Recovery (%)	Recovery Limits (%)	High
EP080/071: Total Petroleum Hydrocarbons (QCLot: 2999879)							
ES2014682-001	Anonymous	EP080: C6 - C9 Fraction	----	325 µg/L	108	70.0	130
EP080/071: Total Recoverable Hydrocarbons - NEPM 2013 Fractions (QCLot: 2999879)							
ES2014682-001	Anonymous	EP080: C6 - C10 Fraction	C6_C10	375 µg/L	107	70.0	130
EP080: BTEXN (QCLot: 2999879)							
ES2014682-001	Anonymous	EP080: Benzene	71-43-2	25 µg/L	85.7	70.0	130



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 Work Order : ES2014745
 Client : RESOLVE ENVIRONMENTAL PTY LTD
 Project : P001004-005

Sub-Matrix: **WATER**

Sub-Matrix: WATER		Matrix Spike (MS) Report					
Laboratory sample ID	Client's sample ID	Method: Compound	CAS Number	Spike		Recovery Limits (%)	
				Concentration	MS	Low	High
EP080: BTEXN (QCLot: 2999879) - continued							
ES2014682-001	Anonymous	EP080: Toluene	108-88-3	25 µg/L	89.1	70.0	130
		EP080: Ethylbenzene	100-41-4	25 µg/L	94.6	70.0	130
		EP080: meta- & para-Xylene	108-38-3	25 µg/L	94.9	70.0	130
			106-42-3				
		EP080: ortho-Xylene	95-47-6	25 µg/L	93.9	70.0	130
		EP080: Napthalene	91-20-3	25 µg/L	73.7	70.0	130



QA/QC Compliance Assessment to assist with Quality Review

Work Order	: ES2014745	Page	: 1 of 4
Client	: RESOLVE ENVIRONMENTAL PTY LTD	Laboratory	: Environmental Division Sydney
Contact	: MITCHELL KNOX	Telephone	: +6138549 9630
Project	: P001004-005	Date Samples Received	: 04-May-2020
Site	: Dundas	Issue Date	: 08-May-2020
Sampler	: RYLEY HARRISON	No. of samples received	: 3
Order number	: -	No. of samples analysed	: 3

This report is automatically generated by the ALS LIMS through interpretation of the ALS Quality Control Report and several Quality Assurance parameters measured by ALS. This automated reporting highlights any non-conformances, facilitates faster and more accurate data validation and is designed to assist internal expert and external Auditor review. Many components of this report contribute to the overall DQO assessment and reporting for guideline compliance.

Brief method summaries and references are also provided to assist in traceability.

Summary of Outliers

Outliers : Quality Control Samples

This report highlights outliers flagged in the Quality Control (QC) Report.

- NO Method Blank value outliers occur.
- NO Duplicate outliers occur.
- NO Laboratory Control outliers occur.
- NO Matrix Spike outliers occur.
- For all regular sample matrices, NO surrogate recovery outliers occur.

Outliers : Analysis Holding Time Compliance

- NO Analysis Holding Time Outliers exist.

Outliers : Frequency of Quality Control Samples

- Quality Control Sample Frequency Outliers exist - please see following pages for full details.



Page : 2 of 4
 Work Order : ES2014745
 Client : RESOLVE ENVIRONMENTAL PTY LTD
 Project : P001004-005

Outliers : Frequency of Quality Control Samples

Matrix: WATER

Quality Control Sample Type	Count		Rate (%)		Quality Control Specification
	QC	Regular	Actual	Expected	
Laboratory Duplicates (DJP)					
TRH - Semivolatile Fraction	0	20	0.00	10.00	NEPM 2013 B3 & ALS QC Standard
Matrix Spikes (MS)					
TRH - Semivolatile Fraction	0	20	0.00	5.00	NEPM 2013 B3 & ALS QC Standard

Analysis Holding Time Compliance

If samples are identified below as having been analysed or extracted outside of recommended holding times, this should be taken into consideration when interpreting results.

This report summarizes extraction / preparation and analysis times and compares each with ALS recommended holding times (referencing USEPA SW 846, APHA, AS and NEPM) based on the sample container provided. Dates reported represent first date of extraction or analysis and preclude subsequent dilutions and reruns. A listing of breaches (if any) is provided herein.

Holding time for leachate methods (e.g. TCLP) vary according to the analytes reported. Assessment compares the leach date with the shortest analyte holding time for the equivalent soil method. These are: organics 14 days, mercury 28 days & other metals 180 days. A recorded breach does not guarantee a breach for all non-volatile parameters.

Holding times for VOC in soils vary according to analytes of interest. Vinyl Chloride and Styrene holding time is 7 days; others 14 days. A recorded breach does not guarantee a breach for all VOC analytes and should be verified in case the reported breach is a false positive or Vinyl Chloride and Styrene are not key analytes of interest/concern.

Matrix: WATER

Evaluation: ✖ = Holding time breach ; ✔ = Within holding time.

Method	Sample Date		Extraction / Preparation		Analysis	
	Container / Client Sample ID(s)		Date extracted	Due for extraction	Evaluation	Due for analysis
EP080/071: Total Petroleum Hydrocarbons						
Amber Glass Bottle - Unpreserved (EP071)	MW03,					
	MW01, MW04	30-Apr-2020	06-May-2020	07-May-2020	✔	07-May-2020 15-Jun-2020
						✔
Amber VOC Vial - Sulfuric Acid (EP080)	MW03,					
	MW01, MW04	30-Apr-2020	06-May-2020	14-May-2020	✔	06-May-2020 14-May-2020
						✔
EP080/071: Total Recoverable Hydrocarbons - NEPM 2013 Fractions						
Amber Glass Bottle - Unpreserved (EP071)	MW03,					
	MW01, MW04	30-Apr-2020	06-May-2020	07-May-2020	✔	07-May-2020 15-Jun-2020
						✔
Amber VOC Vial - Sulfuric Acid (EP080)	MW03,					
	MW01, MW04	30-Apr-2020	06-May-2020	14-May-2020	✔	06-May-2020 14-May-2020
						✔
EP080: BTEXN						
Amber VOC Vial - Sulfuric Acid (EP080)	MW03,					
	MW01, MW04	30-Apr-2020	06-May-2020	14-May-2020	✔	06-May-2020 14-May-2020
						✔

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 Project : P001004-005



Quality Control Parameter Frequency Compliance

The following report summarises the frequency of laboratory QC samples analysed within the analytical lot(s) in which the submitted sample(s) was(were) processed. Actual rate should be greater than or equal to the expected rate. A listing of breaches is provided in the Summary of Outliers.

Matrix: **WATER**

Evaluation: ✖ = Quality Control frequency not within specification ; ✔ = Quality Control frequency within specification.

Quality Control Sample Type Analytical Methods	Method	Count		Rate (%)		Evaluation	Quality Control Specification
		QC	Regular	Actual	Expected		
Laboratory Duplicates (DUP)							
TRH - Semivolatile Fraction	EP071	0	20	0.00	10.00	✖	NEPM 2013 B3 & ALS QC Standard
TRH Volatiles/BTEX	EP080	2	20	10.00	10.00	✔	NEPM 2013 B3 & ALS QC Standard
Laboratory Control Samples (LCS)							
TRH - Semivolatile Fraction	EP071	1	20	5.00	5.00	✔	NEPM 2013 B3 & ALS QC Standard
TRH Volatiles/BTEX	EP080	1	20	5.00	5.00	✔	NEPM 2013 B3 & ALS QC Standard
Method Blanks (MB)							
TRH - Semivolatile Fraction	EP071	1	20	5.00	5.00	✔	NEPM 2013 B3 & ALS QC Standard
TRH Volatiles/BTEX	EP080	1	20	5.00	5.00	✔	NEPM 2013 B3 & ALS QC Standard
Matrix Spikes (MS)							
TRH - Semivolatile Fraction	EP071	0	20	0.00	5.00	✖	NEPM 2013 B3 & ALS QC Standard
TRH Volatiles/BTEX	EP080	1	20	5.00	5.00	✔	NEPM 2013 B3 & ALS QC Standard



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Brief Method Summaries

The analytical procedures used by the Environmental Division have been developed from established internationally recognized procedures such as those published by the US EPA, APHA, AS and NEPM. In house developed procedures are employed in the absence of documented standards or by client request. The following report provides brief descriptions of the analytical procedures employed for results reported in the Certificate of Analysis. Sources from which ALS methods have been developed are provided within the Method Descriptions.

Analytical Methods	Method	Matrix	Method Descriptions
TRH - Semivolatile Fraction	EP071	WATER	In house: Referenced to USEPA SW 846 - 8015A. The sample extract is analysed by Capillary GC/FID and quantification is by comparison against an established 5 point calibration curve of n-Alkane standards. This method is compliant with the QC requirements of NEPM (2013) Schedule B(3)
TRH Volatiles/BTEX	EP080	WATER	In house: Referenced to USEPA SW 846 - 8260D. Water samples are directly purged prior to analysis by Capillary GC/MS and quantification is by comparison against an established 5 point calibration curve. Alternatively, a sample is equilibrated in a headspace vial and a portion of the headspace determined by GCMS analysis. This method is compliant with the QC requirements of NEPM (2013) Schedule B(3)
Preparation Methods	Method	Matrix	Method Descriptions
Separatory Funnel Extraction of Liquids	ORG14	WATER	In house: Referenced to USEPA SW 846 - 3510B. 100 mL to 1L of sample is transferred to a separatory funnel and serially extracted three times using DCM for each extract. The resultant extracts are combined, dehydrated and concentrated for analysis. This method is compliant with NEPM (2013) Schedule B(3). ALS default excludes sediment which may be resident in the container.
Volatiles Water Preparation	ORG16-W	WATER	A 5 mL aliquot or 5 mL of a diluted sample is added to a 40 mL VOC vial for sparging.



Arboricultural Impact Assessment

**Proposed Carwash at
256 Kissing Point Road, Dundas Valley**

Client: Jasbe Petroleum Pty Ltd

Date: September 2020

Author: Alexis Anderson

Qualifications: -Diploma Horticulture (Arboriculture) –AQF Level 5.
-Bachelor of Applied Science (CM)

Membership: -Arboriculture Australia-Member No.2268
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AIA -256 Kissing Point Road, Dundas Valley

September, 2020

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2

BLUEGUM - Tree Care and Consultancy

AIA -256 Kissing Point Road, Dundas Valley

September, 2020

2 Summary

This Arboricultural Impact Assessment (AIA) is based on twenty six (26) trees located at 256 Kissing Point Road, Dundas Valley (subject site).

The tree population of the site consists of planted natives and exotics and two locally native Sydney Blue Gums. The proposed works include construction of a new car wash.

The Retention Values of the subject trees were rated as outlined in the following Table. Refer to the Tree Protection Plan (Attachment C) for tree locations.

Table A: Retention Values of the Subject Trees.

	High Retention Value (Tree Number)	Medium Retention Value (Tree Number)	Low Retention Value (Tree Number)
To be Retained	1, 2, 15, 19, 20, 21, 26	3, 13, 14, 23	22, 24, 25
To be Removed	18	4, 5, 6, 7, 8, 10, 11, 16, 17	9, 12

Seven (7) of the High Retention Value trees and four (4) of the Medium Retention Value trees are able to be retained.

Twelve (12) trees are proposed to be removed as part of this project. This includes one (1) High Retention Value tree, nine (9) Medium Retention Value trees and two (2) Low Retention Value trees.

There are construction works proposed within the Tree Protection Zones (TPZ) of Trees 11 and 19. Recommendations have been made regarding tree protection measures to limit the potential for impact on retained trees.

AIA -256 Kissing Point Road, Dundas Valley

September, 2020

3 Introduction

3.1 Background

This Arboricultural Impact Assessment (AIA) was prepared for Jasbe Petroleum Pty Ltd in relation to the existing trees and a proposed new car wash at 256 Kissing Point Road, Dundas Valley (subject site).

The purpose of this AIA is to assess the likely impacts of the proposed works on the existing site trees and make recommendations regarding construction methods and tree protection measures to limit adverse impacts on trees recommended for retention.

This AIA has been prepared in accordance with the Australian Standard 4970-2009, *Protection of trees on development sites*.

3.2 Subject Site/Proposed Works

The subject site is currently free of built structures and is occupied by open lawn and planted trees.

It is proposed to construct a new car wash facility.

3.3 Subject Trees

All trees within the site have been assessed. The tree population of the site is made up of planted Australian natives and exotics and two locally indigenous Sydney Blue Gum.

Refer to the Tree Protection Plan (Attachment C) for tree locations and numbers. A detailed description of the subject trees is included in the Tree Assessment Table (Attachment A).

4 Methodology

4.1 Site Inspection

Site inspection and tree assessment was undertaken on the 25th of August, 2020. The trees were assessed from ground level using a Tree Assessment Table, which is included as Attachment A. The definitions and explanations of terms used are outlined in the Tree Table Definitions page which is included at Attachment B.

The tree assessment was undertaken for the purpose of pre-development planning. Detailed tree risk assessment was not requested or included in the scope of works.

4.2 Plan Review

The set of plans provided by MCHP Architects (Revision B) were reviewed as part of this assessment. No Stormwater Plan, Landscape Plan or Engineering Detail was available for review as part of this assessment.

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September, 2020

4.3 Tree Protection Zones

Tree assessments in accordance with the Australian Standard 4970-2009, *Protection of trees on development sites*, require calculation of a Tree Protection Zone (TPZ) and Structural Root Zone (SRZ). The following is a brief explanation of these terms:

Tree Protection Zone -TPZ: This is the area that should be isolated from construction disturbance so that the tree remains viable. Some disturbance within the TPZ may be possible following arboricultural assessment.

Structural Root Zone -SRZ: This is the area of undisturbed soil and roots required to maintain tree stability. Excavation within the SRZ can lead to whole tree failure.

Refer to the Tree Assessment Table (Attachment A) for the Tree Protection Zones of the assessed trees.

4.4 Retention Values

Retention values are derived from a combination of Estimated Life Expectancy rating and Landscape and Environmental Significance ratings.

- **HIGH Retention Value:** These trees are worthy of retention and design consideration should be made where possible to allow their retention.
- **MEDIUM Retention Value:** These trees are worthy of retention and minor design consideration should be made to retain these trees wherever possible (e.g. placement of ancillary structures, stormwater pipes, garden retaining walls, driveway levels).
- **LOW Retention Value:** These trees should not be considered to be a constraint to design layout. Some of these trees should be removed irrespective of any proposed development.

The method of determining and defining retention values used in this report has been derived from the ©Retention Index developed by Tree Wise Men® Australia Pty Ltd.

4.5 Consideration for Tree Retention and Removal

Where demolition of existing structures, excavation or fill is proposed within the Tree Protection Zone (TPZ), arboricultural assessment and sensitive construction methods will be required. Where works are proposed outside of the TPZ, no sensitive construction methods are required.

Tree removal recommendations have been based on tree Retention Values and construction offsets.

Trees may generally be recommended for removal in the following circumstances:

- Trees located within construction footprints.
- Trees with construction proposed within SRZ where root loss cannot be avoided through sensitive design.
- Trees with a TPZ loss of more than 25%, may be recommended for removal providing tree sensitive design cannot be implemented to avoid significant root and canopy loss.
- Trees with low Retention Values may be recommended for removal irrespective of proposed development.

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5 Potential Impacts of Proposed Works

5.1 Trees to be removed

Tree Number	Retention Value	Reason for Removal
4, 5, 6, 7, 8, 16	Medium	Within the area of proposed earthworks.
18	High	Within the proposed construction footprint.
10, 11, 17	Medium	
9	Low	
12	Low	Dead tree.

5.2 Potential Impacts of Proposal on Retained Trees

Tree Number	Retention Value	Works proposed within the Tree Protection Zone (TPZ)
13, 14	Medium	Soft landscaping works are proposed within the TPZ. No excavation or fill is proposed within the TPZ.
15	High	<p>A suspended slab supported above existing ground levels on isolated pier footings is proposed within the TPZ. Excavation will be limited to the positions of piers. No drop edge beam is proposed for the eastern side of the Plant Room slab. It will be possible for tree roots to exist beneath the suspended slab. This tree is likely to tolerate the proposed works and remain viable.</p> <p>The site layout, plant room levels and footing design were designed with Arborist consultation with the specific focus of minimising the potential for impacts on this tree.</p>
19	High	<p>Excavation for the driveway slab footings is proposed within the TPZ. Approximately 15-20% of the TPZ area will be affected. Some pruning of fine absorbing roots and woody transport roots will be required. This tree is likely to tolerate the proposed works and remain viable.</p>

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Incidental Impacts: There is the potential for incidental/accidental damage to the trunk, canopy and shallow roots of all retained trees throughout the construction process. Trees are commonly impacted on construction sites in the following ways.

- Stripping of topsoil and removal of organic material from the soil surface.
- Compaction of the topsoil and damage to surface roots through use of heavy machinery and frequent foot traffic.
- Soil contamination through washing out barrows and disposal or spillage of chemical materials.
- Root loss due to unforeseen excavation for plumbing upgrades and landscape construction.
- Bark/trunk and branch injuries from accidental contact with machinery.

These impacts can be easily avoided through communication with building contractors and basic tree protection measures.

6 Recommendations

6.1 Site Establishment –Prior to Demolition/Construction

Appointment of a Project Arborist: An Arborist with an AQF Level 5 qualification in Arboriculture and experience in tree protection within construction sites should be engaged prior to the commencement of work on the site. The Project Arborist should be present at the following times:

- Following installation of tree protection fencing.
- During any excavation within the TPZ of retained trees.
- At any time tree protection fencing is required to be altered.
- At project completion to verify tree protection and retention.

Tree Removal: Twelve (12) trees are proposed to be removed as part of the project. Tree removal contractors should be briefed on the need to protect retained trees during tree removal operations. The mulch collected during the tree removal operation should be retained on-site to be spread within the Tree Protection Zones of retained trees.

Tree removal works should be undertaken in accordance with the WorkSafe Australia *Guide to Managing Risks of Tree Trimming & Removal Work*.

Tree Protection Fencing: Tree Protection Fencing should be installed prior to any machinery or materials being brought on site and remain in position throughout the entire project. Tree Protection Fencing should be erected around the Tree Protection Zones as defined in the Tree Protection Plan (Attachment C). Tree Protection Fencing should consist of 1.8 metre high chainlink panels on moveable concrete pads. Tree Protection Fencing should be clamped at each panel junction. An 80-100mm deep layer of mulch should be spread within the Tree Protection Zones. Tree Protection Fencing should not be moved at any time without consultation with the Project Arborist. An example of adequate tree protection fencing is detailed below.

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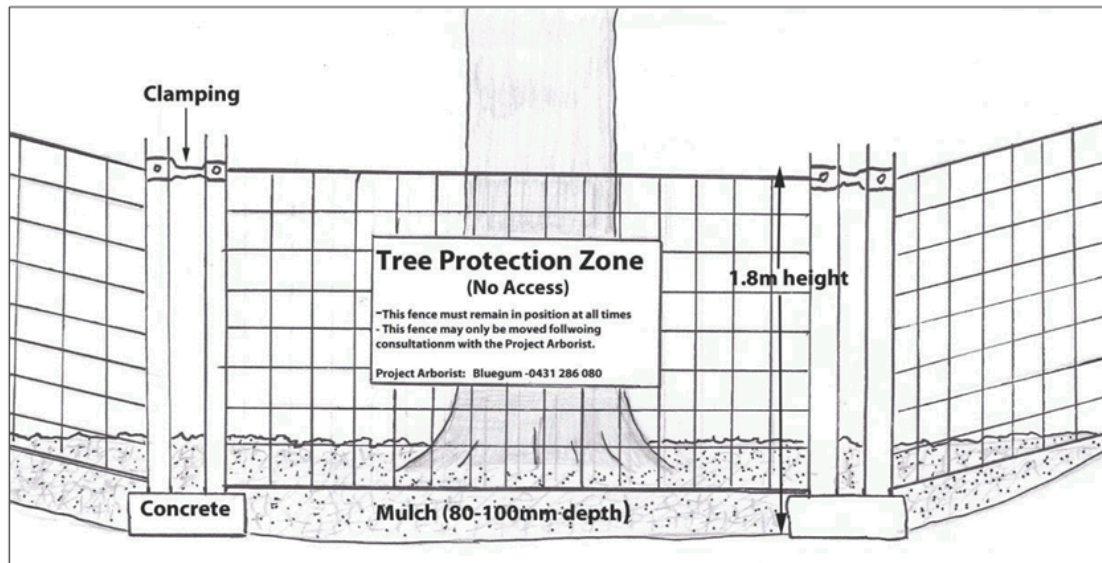


Figure A: Example of adequate tree protection fencing

6.2 During Construction

Excavation for Plant Room Pier Footings (Tree 15): Excavation for the plant room pier footings is proposed within the TPZ (12.0m radius) of Tree 15. Excavation within this radius must be limited to the positions of the pier footings. There must be no topsoil removal, soil scraping or leveling within the 12.0m radius. An open void must be retained between the existing ground level and underside of the plant room slab. There must be no fill beneath the slab or external wall to ground on the eastern side of the plant room.

Excavation for Driveway Footings (Tree 19): Excavation for the plant room pier footings is proposed within the TPZ (6.5m radius) of Tree 19. All excavation within this radius must be undertaken using hand tools within the top 500mm of soil or to the depth of underlying rock. All tree roots encountered must be cleanly cut using a hand saw or secateurs. The purpose of this is to avoid additional unnecessary root damage such (tearing/splintering) that typically occurs when roots are pruned using an excavator and to minimise the surface area of pruning wounds.

Landscaping Works (Trees 13, 14, 15): Existing ground levels must be retained along the eastern boundary within the fenced area shown on the Tree Protection Plan (Attachment C). There must be no soil battering extending into this area. Landscaping works must be limited to new planting and installation of mulch and irrigation.

Tree Protection Zones: Refer to the Tree Assessment Table (Attachment A) for the spread of TPZ's of trees nominated for retention. The following should be prohibited within the Tree Protection Zones:

- Stripping of topsoil or organic surface material outside of construction footprints.

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- Storage of material, vehicles and machinery.
- Disposal of solid, liquid or chemical waste.
- Any excavation, fill or other construction activity other than that discussed in this report.

If the existing groundcover is stripped within a Tree Protection Zone, it should be replaced with leaf and woodchip mulch to a depth of 80-100mm.

6.3 Post Construction

Tree Care: At the completion of the project, the retained trees should be inspected by the Project Arborist. Depending on the health and vitality of retained trees, the Project Arborist may prescribe some remedial tree care. This may include installation of temporary or permanent irrigation, application of soil conditioners, compost application, fertiliser application and installation of mulch.

Tree Risk Management (Tree 15): Tree 15 has wounds from live branch failures and borer/cockatoo browsing. The owners of this tree should be notified of its condition and asked to engage an AQF Level 5 Arborist to conduct an aerial inspection and risk assessment.

Given the high environmental and wildlife habitat value of this tree, it is worthy of retention and careful management.

7 Statement of Impartiality

- This report prepared by Bluegum Tree Care & Consultancy (BTCC) reflects the impartial and expert opinion of Alexis Anderson.
- BTCC is acting independently of and not as the advocate for the owners of the subject trees.
- BTCC does not undertake tree pruning and removal works and will not have any involvement with pruning or removing trees which are the subject of this report.

8 Limitations

- The findings of this report are based upon and limited to visual examination of trees from ground level without any climbing, internal testing or exploratory excavation.
- The tree assessment was undertaken for the purpose of pre-development planning. Detailed tree risk assessment was not requested or included in the scope of works.
- This report reflects the health and structure of trees at the time of inspection. Bluegum cannot guarantee that a tree will be healthy and safe under all circumstances or for a specified period of time. There is no guarantee that problems or defects with assessed trees, will not arise in the future. Liability will not be accepted for damage to person or property as a result of failure of assessed trees.

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BLUEGUM - Tree Care and Consultancy

256 Karing Point Road, Dundas Valley

September, 2020

ATTACHMENT A - Tree Assessment Table

Tree No.	Common Name/ Genus Species	Trunk Diameter (cm)	Height (m)	Canopy Spread (m)	Age Class	Health/Vitality	Structural Condition	Tree Protection Zone (m)	Structural Root Zone (m)	Estimated Life Expectancy (ELE)	Landscape and Environmental Significance	Retention Value	Comments	Works Proposed within the TPZ	Proposed Action
1	Lemon-scented Gum, <i>Corymbia citriodora</i>	50	13	6	M	G	G	6.0	2.6	Long (30+ yrs)	2	High	Located on the neighbouring property.	Nil.	Retain.
2	English Oak, <i>Quercus robur</i>	35	10	5	M	G	G	4.2	2.2	Long (30+ yrs)	2	High	Located on the neighbouring property.	Nil.	Retain.
3	Jacaranda, <i>Jacaranda mimosifolia</i>	32	10	5	M	G	G	3.8	2.1	Long (30+ yrs)	3	Medium		Nil.	Retain.
4	Photinea, <i>Photinea robusta</i>	10, 10, 10, 10	7	3	M	G	G	2.0	1.5	Long (30+ yrs)	3	Medium	Smaller tree located 1m to the east. Provides privacy screening.	Within the area of proposed earthworks.	Remove.
5	Weeping Bottlebrush, <i>Collisterman viminalis</i>	7, 6, 6, 6	5	2	M	G	G	2.0	1.5	Long (30+ yrs)	3	Medium	Provides boundary screening.	Within the area of proposed earthworks.	Remove.
6	Photinea, <i>Photinea robusta</i>	10, 10, 8, 8	7	3	M	G	G	2.0	1.5	Long (30+ yrs)	3	Medium	Provides boundary screening.	Within the area of proposed earthworks.	Remove.
7	Photinea, <i>Photinea robusta</i>	9, 9, 9, 9	6	3	M	G	G	2.0	1.5	Long (30+ yrs)	3	Medium	Provides boundary screening.	Within the area of proposed earthworks.	Remove.
8	Photinea, <i>Photinea robusta</i>	10, 9, 9	6	2	M	G	G	2.0	1.5	Long (30+ yrs)	3	Medium	Provides boundary screening.	Within the area of proposed earthworks.	Remove.
9	Tallowwood, <i>Eucalyptus microcorys</i>	79	19	6	M	F	P	9.5	3.1	Short (0-10 yrs)	3	Low	Lowest large limb on the E side is dead. There are 2 large live limb failure wounds on the S and W sides.	Within the proposed construction footprint.	Remove.
10	Wallangarra White Gum, <i>Eucalyptus scoparia</i>	61	13	5	M	F	F	7.3	2.8	Medium (10-30 yrs)	3	Medium	Internal trunk decay is likely at 1.0m height as indicated by trunk bulging around the old wound sites.	Within the proposed construction footprint.	Remove.
11	Red Ironbark, <i>Eucalyptus sideroxylon</i>	38	12	5	M	G	F	4.6	2.2	Medium (10-30 yrs)	3	Medium	Weak stem junction at 7.0m height as indicated by the included bark and weeping kino.	Within the proposed construction footprint.	Remove.
12	Dead Tree	-	-	-	-	-	-	-	-	Remove	5	Low	Dead.	NA.	Remove.
13	Lemon-scented Tea Tree, <i>Leptospermum parvifolium</i>	12, 10, 10	6	3	M	G	G	2.0	1.5	Medium (10-30 yrs)	3	Medium	Located on the neighbouring property. The canopy overhangs the boundary by 2.5m.	Soft landscaping works are proposed within the TPZ. No excavation is proposed.	Retain.
14	Weeping Bottlebrush, <i>Collisterman viminalis</i>	7, 6, 6	5	2	EM	G	G	2.0	1.5	Long (30+ yrs)	3	Medium	Located on the neighbouring property.	Soft landscaping works are proposed within the TPZ. No excavation is proposed.	Retain.
15	Sydney Blue Gum, <i>Eucalyptus saligna</i>	100 (approx)	27	10	M	G	F	12.0	3.6	Long (30+ yrs)	2	High	Wounds from live branch failures and cockatoo browsing. It is recommended that the owners of the tree engage an AQF level 5 Arborist to conduct an aerial inspection and risk assessment.	A suspended slab supported on isolated pier footings is proposed within the TPZ. Excavation will be limited to the positions of piers. It will be possible for tree roots to exist beneath the suspended slab.	Retain.
16	Sydney Blue Gum, <i>Eucalyptus saligna</i>	51	14	4	EM	G	G	6.1	2.5	Long (30+ yrs)	3	Medium	Previously topped at 3.5m height.	Within the area of proposed earthworks.	Remove.
17	Tallowwood, <i>Eucalyptus microcorys</i>	18, 18, 17, 17	9	3	EM	F	F	4.3	2.2	Long (30+ yrs)	3	Medium	Consists of 6 stems growing from a previously cut stump at ground level.	Within the proposed construction footprint.	Remove.
18	Tallowwood, <i>Eucalyptus microcorys</i>	71	13	7	M	G	G	8.5	2.9	Long (30+ yrs)	2	High		Within the proposed construction footprint.	Remove.

Tree Assessment Table

BLUEGUM - Tree Care and Consultancy

256 Kissing Point Road, Dundas Valley

ATTACHMENT A - Tree Assessment Table

September, 2020

Tree No.	Common Name/ Genus Species	Trunk Diameter (cm)	Height (m)	Canopy Spread (m)	Age Class	Health/Vitality	Structural Condition	Tree Protection Zone (m)	Structural Root Zone (m)	Estimated Life Expectancy (ELE)	Landscape and Environmental Significance	Retention Value	Comments	Works Proposed within the TPZ	Proposed Action
19	Spotted Gum, <i>Corymbia maculata</i>	54	14	4	M	G	G	6.5	2.6	Long (30+ yrs)	2	High		Excavation for new slab footings is proposed within the TPZ. Approximately 15-20% of the TPZ area will be affected.	Retain.
20	Spotted Gum, <i>Corymbia maculata</i>	46	17	4	M	G	G	5.5	2.4	Long (30+ yrs)	2	High		Nil.	Retain.
21	Spotted Gum, <i>Corymbia maculata</i>	38	17	4	M	G	G	4.6	2.3	Long (30+ yrs)	2	High		Nil.	Retain.
22	Spotted Gum, <i>Corymbia maculata</i>	19	3	1	M	F	P	2.3	1.7	Short (0-10 yrs)	3	Low	Lopped for powerline clearance.	Nil.	Retain.
23	Spotted Gum, <i>Corymbia maculata</i>	30	9	2	M	F	P	3.6	2.1	Medium (10-30 yrs)	3	Medium	Lopped for powerline clearance.	Nil.	Retain.
24	Spotted Gum, <i>Corymbia maculata</i>	15	3	1	M	F	P	2.0	1.5	Short (0-10 yrs)	3	Low	Lopped for powerline clearance.	Nil.	Retain.
25	Spotted Gum, <i>Corymbia maculata</i>	23	4	1	M	F	P	2.8	1.8	Short (0-10 yrs)	3	Low	Lopped for powerline clearance.	Nil.	Retain.
26	Spotted Gum, <i>Corymbia maculata</i>	54	16	4	M	G	F	6.5	2.6	Medium (10-30 yrs)	2	High		Nil.	Retain.

BLUEGUM - Tree Care and Consultancy

Tree Assessment Table

256 Kissing Point Road, Dundas Valley

September, 2020

Attachment B: TREE ASSESSMENT DEFINITIONS

Height. Tree height is estimated from ground level. This assessment is made independently of data plotted on survey plan. These measurements have not been confirmed with clinometer or other surveying instrument.

Trunk Diameter. Trunk diameter is measured at 1.4 metres above ground level. A diameter tape is used which calculates the diameter from a measurement of the circumference. DBH is primarily used for the calculation of the TPZ and SRZ.

If a tree has more than 4 trunks, the diameter of the four largest trunks is recorded. For irregular trunk formations the DBH is calculated as outlined in Appendix A of AS4970-2009 -*Protection of Trees on Development Sites*.

Canopy Spread Radius. Average canopy spread radius is estimated from the centre of trunk to the outer edge of canopy. Refer to Comments column for detail of heavily skewed canopy spread.

Age Class - This is an estimation of the tree's current age class based on size, growth habit, local environmental conditions and comparison with surrounding trees.

- **Immature (IM):** This is a juvenile specimen that is likely to have germinated within the previous 5 years.
- **Early Mature (EM):** This is a tree that is established within its growing environment, though has not reached an age of reproductive maturity or the natural growth habit of a mature individual.
- **Mature (M):** This is a tree has reached both reproductive maturity and a physical form and shape typical for the species. Trees can have a Mature Age Class for the majority of their life span.
- **Late-Mature (LM):** There trees show early signs of senescence with symptoms such as reduced canopy density and an accumulation of dead branches.
- **Over-mature (OM):** These trees show symptoms of irreversible decline such as canopy dieback with dead branches concentrated in the upper canopy.

Health/Vitality - Good (G), Fair (F) or Poor (P). This is primarily based on the extent of vigorous new foliage growth at branch tips and the colour, size and density of foliage generally. The percentage of live branches to dead branches is considered. The location of any dead branches is also considered. The presence of any pest or disease is considered as part of this assessment. Health can vary with climatic conditions.

Structural Condition - Good (G), Fair (F) or Poor (P). This is an assessment of tree structure and stability. Root anchorage, trunk lean, structural defects, canopy skew and any hazardous features are considered. Dead branches can be considered as part of Structural Condition if they are of a size and location that could cause injury or property damage.

Tree Protection Zone (TPZ). This is a radial distance of (12X) the DBH measured from centre of trunk. TPZ is rounded to the nearest 0.1 metre. A TPZ should not be less than 2m or greater than 15m. The TPZ for palms and other monocots should not be less than 1m outside of the crown projection. Existing constraints to root spread can vary the TPZ. For a tree to remain viable, construction activity should be excluded or undertaken with care within the TPZ. Disturbance within up to 10% of the TPZ area is considered to be a minor encroachment. Disturbance to more than 10% of the TPZ area is considered a major encroachment. Major encroachment into the TPZ is possible depending on the type of disturbance, and species tolerance to disturbance. Exploratory excavation may be required to quantify the presence of roots at the alignment of proposed ground disturbance. This is based upon the Australian Standard AS 4970, 2009, *Protection of trees on development sites* and the Matheney & Clarke "Guidelines for adequate tree preservation zones for healthy, structurally stable trees".

Structural Root Zone (SRZ). This is a radial distance based on the following formula- $SRZ = (D \times 50)^{0.42} \times 0.64$ (for trees less than 150mm Diameter, a minimum SRZ of 1.5 metres). SRZ measurements are rounded to the nearest 0.1m.

The Structural Root Zone is the area of soil and roots required to maintain tree stability. Excavation within the SRZ can result in whole tree failure. Fully elevated construction is possible within SRZ with specific rootzone assessment. Existing constraints to root spread can vary the SRZ. This method of determining SRZ is outlined at Section 3.3.5 of Australian Standard AS 4970, 2009, *Protection of trees on development sites*.

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Estimated Remaining Life Expectancy: This gives a length of time that the Arborist believes a particular tree can be retained from the time of assessment with an acceptable level of risk based on the information available at the time of the inspection. This system of rating does not take into consideration the likely impacts of any proposed development. Ratings are **Long** (retainable for 30 years or more with an acceptable level of risk), **Medium** (retainable for 10-30 years), **Short** (retainable for 0-10 years) and **Removal** (tree requiring removal due to risk/hazard or absolute unsuitability).

Landscape & Environmental Significance*. This is an assessment of the impact of the tree on the surrounding landscape amenity and natural environment. Rarity, habitat value, physical prominence, historical and cultural significance of the tree are considered in this rating system. The Landscape & Environmental Value ratings used in this report are:

- 1. Very High Value:** This is an outstanding specimen that holds irreplaceable environmental, landscape or cultural value.
- 2. High Value:** An excellent specimen that holds environmental, landscape or cultural value that is present in other site trees or that could be replaced.
- 3. Moderate Value:** Can be a good to fair specimen with environmental, landscape or cultural value that is common within other trees in the locality.
- 4. Low Value:** Removal would not result in any loss of site amenity or environmental value. Can include undesirable or weed species or trees growing in unsuitable locations.
- 5. Very Low Value:** Dead or hazardous with no other environmental or cultural value. Could also include weed species. These trees should be removed or pruned in a way to make safe irrespective of any development.

***Note:** The concept of using a five (5) point scale to assess tree significance was derived from the Tree Wise Men® Australia Pty Ltd ©Significance Rating Scale.

Retention Value*. Retention values are derived from a combination of Estimated Life Expectancy rating and Landscape and Environmental Significance ratings.


Significance Environmental Landscape &		Estimated Life Expectancy			
		Long	Medium	Short	Removal
	Very High (1)	HIGH		MEDIUM	
	High (2)				
	Medium (3)	MEDIUM			
	Low (4)				
	Very Low (5)	LOW			

HIGH Retention Value: These trees are worthy of retention and major design consideration should be made where feasible to allow this.

MEDIUM Retention Value: These trees are worthy of retention and minor design consideration should be made to retain these trees wherever possible (e.g. placement of ancillary structures, garden retaining walls, driveway levels).

LOW Retention Value: These trees should not be considered to be a constraint to design layout. Some of these trees should be removed irrespective of any proposed development.

***Note:** The method of determining and defining retention values used in this report has been derived from the ©Retention Index developed by Tree Wise Men® Australia Pty Ltd.



Tree Protection Plan

256 Kissing Point Road, Dundas Valley

This plan is to be read in conjunction with the Aboriginal Impact Assessment report prepared for this site, September 2020.

This plan has been prepared using the Proposed Site Plan-MCHP Architects, as a base.

Tree protection detail is indicative only. Final positions should be determined with coordination between the Site Foreman and Project Arborist to allow adequate site access during construction.

In areas where tree protection fencing is not feasible or inhibiting safe site access, trunk battering and ground protection will be required as an alternative.

Legend

- Tree Protection Zone
- Structural Root Zone (Tree 15)
- Tree Protection Fencing

PROPOSED SITE PLAN

AT SCALE 1:200
3 1 10 20 METRES

PRELIMINARY



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Atkins Acoustics and Associates Pty Ltd.

Consulting Acoustical & Vibration Engineers

**CAR WASH NOISE ASSESSMENT
BP SERVICE STATION CONVENIENCE STORE
256 KISSING POINT ROAD
DUNDAS VALLEY**

50.7181.R1:GA/DT/2020
Rev 00

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September 2020



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ATTACHMENTS

ATTACHMENT 1: SITE LOCATION
ATTACHMENT 2: PROPOSED SITE LAYOUT
ATTACHMENT 3: AMBIENT NOISE MONITORING RESULTS
ATTACHMENT 4: NOISE MODELLING CAR WASH PLANT AND ACTIVITIES
ATTACHMENT 5: NOISE MODELLING FOR NIGHT-TIME TRANSIENT ACTIVITIES

The information presented in this report should not be reproduced, presented or reviewed except in full and in context with the assumptions adopted. The report and findings are based on the specific assumptions reported. Atkins Acoustics makes no representation, undertakes no duty and accepts no responsibility to any third party who may use or rely upon this document. It is the responsibility of any third party to confirm if the information presented in the report is suitable for their specific requirements. No parties other than the Client should use or rely on the reported information without written authority from Atkins Acoustics. Advice has been provided for acoustic reasons only and it is recommended expert advice be sought on all ramification, e.g. health, safety, fire, structural, etc associated with any proposals contained herein.

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1.0 Introduction

Atkins Acoustics was retained by *MCHP Architects* on behalf of *Jasbe Petroleum* to prepare a noise assessment to support a Development Application for a proposed car wash facility at the BP Service Station Convenience Store site at 265 Kissing Point Road, Dundas Valley (*Attachment 1*).

To address potential noise issues the assessment has been based on:

- site inspections;
- measurement of the existing ambient background noise levels;
- assessment procedures recommended in the NSW EPA, Noise Policy for Industry (*NPfI*) and the Road Noise Policy (*RNP*);
- architectural site plans; and
- noise modelling.

The report presents the results, findings and recommendations of the assessment and prepared for the particular investigation described. No part of the report should be used in any other context or for any other purpose without the approval of *Atkins Acoustics* and *MCHP Architects*. Advice with respect to all other requirements should be reviewed and confirmed by others.

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2.0 Description of Site and Proposal

2.1 The Site

BP Dundas Valley is located at the corner of Kissing Point Road and Quarry Road, Dundas Valley. The site is developed with an existing BP Service Station and Convenience Store and automatic SoftCare Pro Touchless Car Wash (*Attachment 1*). Vehicle site access and egress is provided from Kissing Point Road and Quarry Road.

2.2 Adjacent Developments

Immediate residential properties (*Attachment 1*) potentially exposed to noise from the proposal are located on the northern and eastern site boundaries. Other residential properties are located further from and partly acoustic screened from the proposal.

2.3 Plant and Equipment

At the present time the selections of new plant and equipment for the site are preliminary but realistic. Final selections would be confirmed during the detailed design phase to satisfy pending Council DA Consent Conditions. The details would be submitted with the CC documentation for approval. The proposal provides for the demolition of the existing car wash and the development of vacant land to the east of the existing Convenience Store to provide for three (3) self serve wash bays, two (2) auto wash bays, a plant room to house the car wash plant and equipment and four (4) self serve vacuum bays. Vehicle access to the proposed car wash facility would be provided from the southern side of the Convenience Store with egress on the northern side (*Attachment 2*).

2.4 Operating Hours

The existing Services Station and Convenience Store trades twenty-four (24) hours, seven (7) days a week.

The proposal is seeking approval for the car wash and vacuum bays to operate up to twenty-four (24) hours, seven (7) days a week.

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3.0 Existing Noise Environment

For the purpose of establishing project noise assessment goals, the existing ambient background noise levels were measured from Saturday 22nd to Monday 30th August 2020.

The reference locations (*Attachment 1*) adopted to measure the ambient noise levels were selected to represent residential properties exposed to the proposal.

Instrumentation selected for the measurements comprised Svan 957 Sound Level Meters. The reference level of each instrument was checked prior to and after the measurements with a NATA calibrated Bruel & Kjaer Sound Level Calibrator Type 4230, with no significant drifts recorded. The meters were set to A-weighting, fast response and fifteen (15) minute sampling periods.

The ambient noise levels were measured and assessed as percentile A-weighted sound levels. The parameters regarded as being the most important amongst these, are the “ L_{A90} ”, the level exceeded for 90% of the sample period and referenced as the “background or average minimum noise level”, and the “ L_{Aeq} ”, which is the A-weighted energy equivalent continuous (constant) sound level.

From *NPfI* assessment procedures the existing Rating Background Level (*RBL*) and ambient L_{Aeq} levels were established to determine noise assessment goals. The *RBL* is the median of the tenth percentile background level for each assessment period over the measurement period. The L_{Aeq} level represents the energy averaged level for each assessment period.

Table 1 presents a summary of the existing ambient noise levels for the daytime, evening and night-time hours, and the calculated *RBL* and L_{Aeq} levels. *Attachment 3* presents the measurement results in graphical form.

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Table 1. Measured RBL and L_{Aeq} Noise Levels

dBA re: 20×10^{-6} Pa

Date	Assessment Background Level			Equivalent Continuous Level		
	RBL			$L_{Aeq, Period}$		
	Day	Evening	Night	Day	Evening	Night
Measurement Location M1. Northern site boundary						
Saturday 22 August		43.3	36.0		54.6	49.8
Sunday 23 August	43.8	43.3	35.2	58.0	55.2	50.8
Monday 24 August	44.0	43.2	35.4	56.7	53.2	49.9
Tuesday 25 August	43.4	43.3	36.1	55.9	53.5	49.8
Wednesday 26 August	43.1	45.0	36.1	55.6	56.0	50.0
Thursday 27 August	44.3	43.5	39.1	58.2	54.2	50.9
Friday 28 August	44.2	44.4	36.1	57.2	53.7	53.5
Saturday 29 August	44.4	45.3	37.7	57.9	55.3	50.7
Sunday 30 August	44.8	43.5	37.5	58.0	55.7	50.5
RBL	44.1	43.5	36.1			
Ambient L_{Aeq}				57.3	54.7	50.8
Measurement Location M2. Eastern site boundary						
Saturday 22 August	-	49.7	42.9	-	58.9	54.0
Sunday 23 August	51.0	47.6	41.4	59.6	57.7	56.4
Monday 24 August	51.5	49.9	41.6	59.6	57.9	56.7
Tuesday 25 August	51.3	49.9	41.5	59.9	57.9	56.3
Wednesday 26 August	51.7	50.5	41.0	59.8	58.1	56.7
Thursday 27 August	51.3	51.2	40.7	59.6	58.2	58.0
Friday 28 August	51.7	49.9	41.5	59.7	58.0	53.3
RBL	51.4	49.9	41.5			
Ambient L_{Aeq}				59.7	58.1	56.2

NOTE: Day: 7.00am to 6.00pm Monday to Saturday, 8.00am to 6.00pm Sunday and public holidays
Evening : 6.00pm to 10.00pm
Night : 10.00pm to 7.00am Monday to Saturday, 10.00pm to 8.00am Sunday and public holidays

Observations during site inspections confirmed that the ambient noise is controlled by road traffic, intermittent onsite activities, mechanical plant and local domestic activities.

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4.0 Assessment Noise Criteria

The assessment of noise from the proposal has addressed procedures and guidelines published in NSW Environmental Protection Authority's - Noise Policy for Industry (*NPfI*) and the NSW Road Noise Policy (*RNP*).

The *NPfI* sets out procedures to determine project levels for accessing noise from industrial/commercial developments. Whilst there is no industrial noise associated with the proposal, for consistency the *NPfI* has been adopted for assessing noise.

4.1 NPfI Intrusive Noise Criterion

The *NPfI* states that the intrusiveness of a noise source is considered to be acceptable if the $L_{Aeq,15min}$ level does not exceed the rated background level (*RBL*) level by more than 5dB. *Table 2* sets out a summary of the recommended intrusive noise criteria

Table 2. Intrusive noise levels

$L_{Aeq,15min}$ re: 20×10^{-6} Pa

Units	Intrusive Noise Levels		
	$L_{Aeq,15min} 20 \times 10^{-6}$ Pa		
	Day	Evening	Night
Assessment Locations R1, R2 and R3			
RBL	44.1	43.5	36.1
$L_{Aeq,15min}$	49	48	41
NOTES:	Day: 7.00am to 6.00pm Monday to Saturday, 8.00am to 6.00pm Sunday and public holidays Evening: 6.00pm to 10.00pm Night: 10.00pm to 7.00am Monday to Saturday, 10.00pm to 8.00am Sunday and public holidays		

4.2 Maximum Noise Level Events

Noise from short duration events may cause disturbance to sleep during night-time hours (10.00pm to 7.00am), if not managed. The *NPfI* screening test for assessing intermittent noise during night-time hours outside bedroom windows is L_{AFmax} 52dBA or RBL + 15dBA, which ever is the greater

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Where the screening test cannot be met, the *NPfI* recommends that a detailed assessment should be undertaken. Other guidelines that address sleep disturbance include the *NSW Road Noise Policy (RNP)*. Based on currently available research, the *RNP* reports:

- 'Maximum internal noise levels below 50dBA to 55dBA are unlikely to cause awakening reactions'
- "One or two noise events per night, with maximum internal noise levels of 65dBA to 70dBA, are not likely to affect health and wellbeing significantly"

Considering a nominal noise reduction of 10dB across a typical residential building façade with windows open, the equivalent external levels unlikely to cause awakening reactions are "in the order of $L_{A1,1min}$ or L_{Amax} 60-65dBA.

4.3 Project Noise Assessment Levels

For the assessment of noise from mechanical plant, project noise levels developed from *NPfI* procedures represent the level that, if exceeded, may indicate a potential noise impact upon a community. The project noise level is set as a benchmark or objective and is not intended for use as mandatory requirements. Considering the *NPfI* procedures, *Table 3* presents the assessment *RBL*'s and the recommended project levels for assessing noise from the site.

Table 3. Project specific assessment noise levels

dBA re: 20×10^{-6} Pa

Period	Rating Background Level	Intrusive Noise Levels	Sleep Arousal Assessment Levels
	RBL	$L_{Aeq, 15min}$	$L_{A1, 1min}$
Residential Assessment Locations R1, R2 and R3			
Day	44	49	N.A.
Evening	43	48	N.A.
Night	36	41	52* (60-65)**

NOTES. * *NPfI* Screen Test Recommended Level

** "RNP External levels below 60dBA to 65dBA are unlikely to cause awakening reactions"

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5.0 Car Wash Noise Sources

The main identified noise sources associated with the proposal include service plant and equipment, car washing and vacuuming, customers and vehicles.

5.1 Mechanical Plant

The primary plant and equipment of acoustical significance includes water pumps, air compressor and vacuum plant.

5.1.1 Automatic Car Wash and Drier

Noise sources associated with the automatic car wash include pumps, water sprays, wash rollers and the drier. The car wash would be housed within a purpose built building incorporating an integrated automatic roller door on the exit. For evaluating noise from the car wash building, the manufactures (WashTec SoftCare Pro Touchless) free field rated sound power levels for the wash and drying cycles are 85.5dBA and 105dBA, respectively. Providing the project noise assessment goals are satisfied alternative car wash plant and equipment could be selected.

Audit noise measurements conducted at BP Dundas Valley confirmed for identifying and ranking noise from the car wash building, that the entry and exit openings ranked the highest sources. From nearfield measurements a sound power level contribution of $L_{Aeq\ 15min}$ 98 was calculated for each door opening. Noise data from Washtec Australia confirmed a sound pressure level of 68.9dBA at ten (10) metres from entry/exist openings.

5.1.2 Self Serve Car Wash Bays

Audit noise measurements conducted at BP Picton confirmed noise from the self-serve wash bays was dependent on the wash cycle. The highest sources being high pressure wash cycle. From nearfield measurements a sound power level contribution of $L_{Aeq\ 15min}$ 93 was established for a typical wash cycle.

5.1.2 Car Wash Plant Room

Plant items associated with car wash services include an air compressor, water treatment pumps and water pressure pumps. Sound pressure levels measurements within the Dundas plant room identified the Pilotair vertical air compressor controlled the internal and external noise. With normal water treatment and pressure pumps operating the internal space average reverberant sound pressure level typically ranged between 75-80dBA, with the air compressor operating the internal level increased to 97dBA,

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5.1.3 Vacuum Plant

Noise from vacuum systems is associated with the electric motors and vacuum blowers. Typical vacuum systems are purpose built and can be supplied with factory fitted noise mitigation options. For modelling and evaluating noise from the vacuum systems, the manufactures (WashTec Australia Pty Ltd) Dual Vacuum (with insulation) rated sound pressure level of 56dBA at one (1) metre was adopted.

5.2 Onsite Transient Activities

In terms of transient onsite night-time noise, measurements undertaken by *Atkins Acoustics* established the level of noise is dependent on the activity. The sound power levels set out in *Table 4* represent the typical range and average maximum $L_{A1,1min}$ levels generated by onsite vehicles and customers.

Table 4. Vehicle, customer noise levels (L_{A1})

$L_{A1,1min}$ re: 10^{-12} Watts

Noise Source	Sound Power Level
	$L_{A1,1min}$ dBA
Speech	70 – 85 (80)
Car Moving	80 – 90 (88)
Car Accelerating	90 – 105 (95)
Closing Car Doors	88-93 (90)
Cars Starting	90 – 105 (95)

NOTES: Numbers in brackets represent the 90 percentile levels of the $L_{A1,1min}$ levels

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6.0 Noise Modelling

6.1 Car Wash Plant and Equipment

Referring to the plant and equipment items in Section 5 noise contributions have been predicted to the adjoining residential properties (*Attachment 1*). Considering distance separation, site shielding and recommended noise controls, *Attachment 4* presents a summary of predicted noise level contributions and cumulative levels for the referenced noise receptors. The results in *Attachment 4* demonstrate that noise from the envisaged plant and site activities with appropriate engineering controls and site management can be controlled to satisfy the recommended project noise goals

6.2 Onsite Nighttime Transient Activities

Considering distance separation, noise controls and site screening *Attachment 5* presents a summary of the predicted noise levels. *Table 5* provides a summary of the predicted levels.

Table 5: Summary of Predicted Noise Levels (Sleep Arousal)

$L_{A1,1min}$ dBA re: 20×10^{-6} Pa

Description	Assessment Noise Goals	Predicted Sound Pressure Levels	Compliance
	dBA	dBA	
Assessment Location R1: Quarry Road			
Vehicles, people	52* (60-65)**	25-47	√
Assessment Location R2: Quarry Road			
Vehicles, people	52* (60-65)**	25-51	√
Assessment Location R3: Pedrick Place			
Vehicles, people	52* (60-65)**	25-42	√

NOTES: * NPfl Screen Test Recommended Level

** "RNP External levels below 60dBA to 65dBA are unlikely to cause awakening reactions"

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7.0 Assessment

Modelling for assessing noise from the BP Dundas Valley car wash proposal (*Attachment 1*) has shown:

- the proposal provides an opportunity through the site layout, plant room, noise walls and plant/equipment selections to control noise from the proposal;
- noise from plant and equipment with appropriate selection, design and installation can be controlled to satisfy the recommended assessment goals, and
- noise from the envisaged onsite transient activities with appropriate restrictions can be managed and satisfy the *NPfl* sleep arousal screening test and the *RNP* sleep awakening reaction levels of 60dBA-65dBA.

7.1 Recommendations

The findings of the noise modelling and assessment are based on the following:

- plant room walls, floor and roof/ceiling acoustically detailed to provide a noise reduction of not less than 35dBA. All interfaces between walls/floor/ceiling acoustically detailed to control flanking noise.
- the access door to the north façade of the plant room installed with acoustic rated seals and selected to provide a noise reduction of not less than 35dBA.
- heavy duty roller door in the southern façade of the plant room detailed at the sides and head to control breakout noise.
- plant installed in the plant room installed on anti-vibration mounts selected to provide not less than 80% vibration isolation.
- all pipes servicing the plant room equipment acoustically isolated from the plant and the plant room floor and walls.
- the carwash plant room floor slab laid on infill or acoustically detailed to enclose opening between ground level and underside of slab.
- operating hours of the automatic car wash/dryer bays restricted to between 7.00am and 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.
- operating hours of the self-serve wash bays 2 and 3 restricted to between 7.00am and 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.
- operating hours of vacuum bays 3 and 4 restricted to between 7.00am and 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.

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- the existing vacuum plant replaced WashTec Australia Pty Ltd, Dual Vacuum (with insulation) acoustically rated at 56dBA at one (1) metre or equivalent .
- the existing plant room air compressor replaced with a Pilotair K17si acoustically rated at 63dBA at one (1) metre or equivalent.
- final details of plant selections and operating hours to be reviewed and assessed during the CC design phase.
- the car wash exit door specified with not less than 3mm thick PVC and detailed to ensure that the bottom of the door in the closed position controls breakout noise.
- the operation sequence of the car wash exit door controlled to ensure it is closed prior to the wash cycle and remains closed during the wash and drying cycles.
- the car wash glass panels specified with not less than 12mm thick toughened glass.
- the car wash and plant room walls not less 100mm precast concrete or equivalent;
- the car wash roof/ceiling detailed with or equivalent to 0.48 BMT Klip-Lok roof decking laid over glasswool insulation, ceiling cavity not less than 150mm and a suspended 4.2 BMT Stramit Monopanel with 70mm (R2.0) Sound Screen cavity insulation, All interfaces between walls/roof/ceiling acoustically detailed to control flanking noise.
- a 3m high (above finished concrete driveway kerb level) acoustic rated wall constructed on the northern side of the vacuum bays, extending to the west adjacent to the car wash exit driveway (*Attachment 2*).
- a 3m high (above finished concrete kerb level) acoustic rated wall constructed on the eastern side of the existing service yard extending to the northern facades of the existing convenience store (*Attachment 2*).
- a 4m high (above finished concrete kerb level) acoustic rated wall constructed on the eastern side of the vacuum bays and extending to the northern faced of the car wash plant room (*Attachment 2*).
- a 4m high (above finished concrete kerb level) acoustic rated wall constructed on the southern side of the car wash plant room extending to the eastern site boundary (*Attachment 2*).
- final details of acoustic rated walls to be reviewed and assessed during the CC design phase. .
- the existing timber screens/fences along the northern side of the site to be retained.
- driveway speed calming devices and stormwater grates selected and installed to eliminated vehicle drive over impact noise.

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8.0 Summary

Atkins Acoustics was retained by *MCHP Architects* on behalf of *Jasbe Petroleum* to prepare a noise assessment to support a Development Application for a proposed car wash at the BP Service Station Convenience Store, 265 Kissing Point Road, Dundas Valley (*Attachment 1*).

The existing Services Station and Convenience Store trades twenty-four (24) hours, seven (7) days a week. The proposal is seeking approval for the car wash and vacuum bays to operate unto twenty-four (24) hours, seven (7) days a week.

To address potential noise issues the assessment has been based on:

- site inspections;
- measurement of the existing ambient background noise levels;
- assessment procedures recommended in the NSW EPA, Noise Policy for Industry (*NPfI*) and the Road Noise Policy (*RNP*);
- architectural site plans; and
- noise modelling.

The findings of the assessment have shown that noise from plant/equipment can be controlled through selection and design detailing to satisfy the recommended noise assessment goals.

Modelling for transient site activities has demonstrated with the proposed 4.0m noise wall on the eastern side of the site and a 3.0m wall on part of the northern boundary night-time noise levels satisfy the *NPfI* sleep arousal screening test goal of 52dBA and the *RNP* unlikely to cause awakening reactions external test below 60dBA to 65dBA.

With effective engineering, site management and night-time restrictions (Section 7.1) the findings of the assessment demonstrate that the proposed car wash facility could operate up to 24 hours, seven (7) days a week. Final plant selections and specific operating hours to be reviewed and assessed during the CC design phase.

Final acoustic design requirements for the BP Dundas Valley site would be subject to Council DA consent conditions and confirmed during the detailed CC documentation design phase. The CC acoustic design review would be undertaken to address mechanical plant selections and operating hours to ensure the project noise goals and any pending noise limits imposed by the Council are addressed.

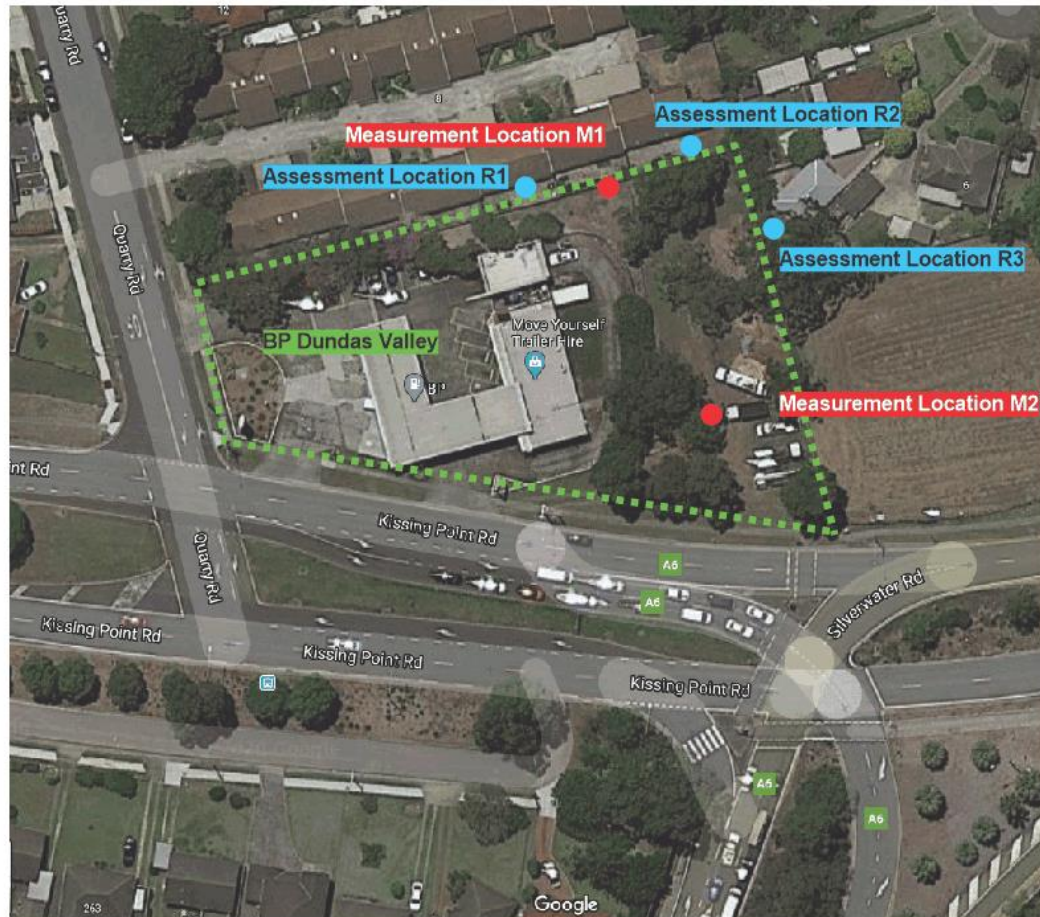
ATKINS ACOUSTICS

CAR WASH NOISE ASSESSMENT
BP SERVICE STATION CONVENIENCE STORE
256 KISSING POINT ROAD
DUNDAS VALLEY

ATTACHMENT 1

50.7206.R1:GA/DT/2020

September 2020

ATTACHMENT 1: SITE LOCATION (GoogleMaps)

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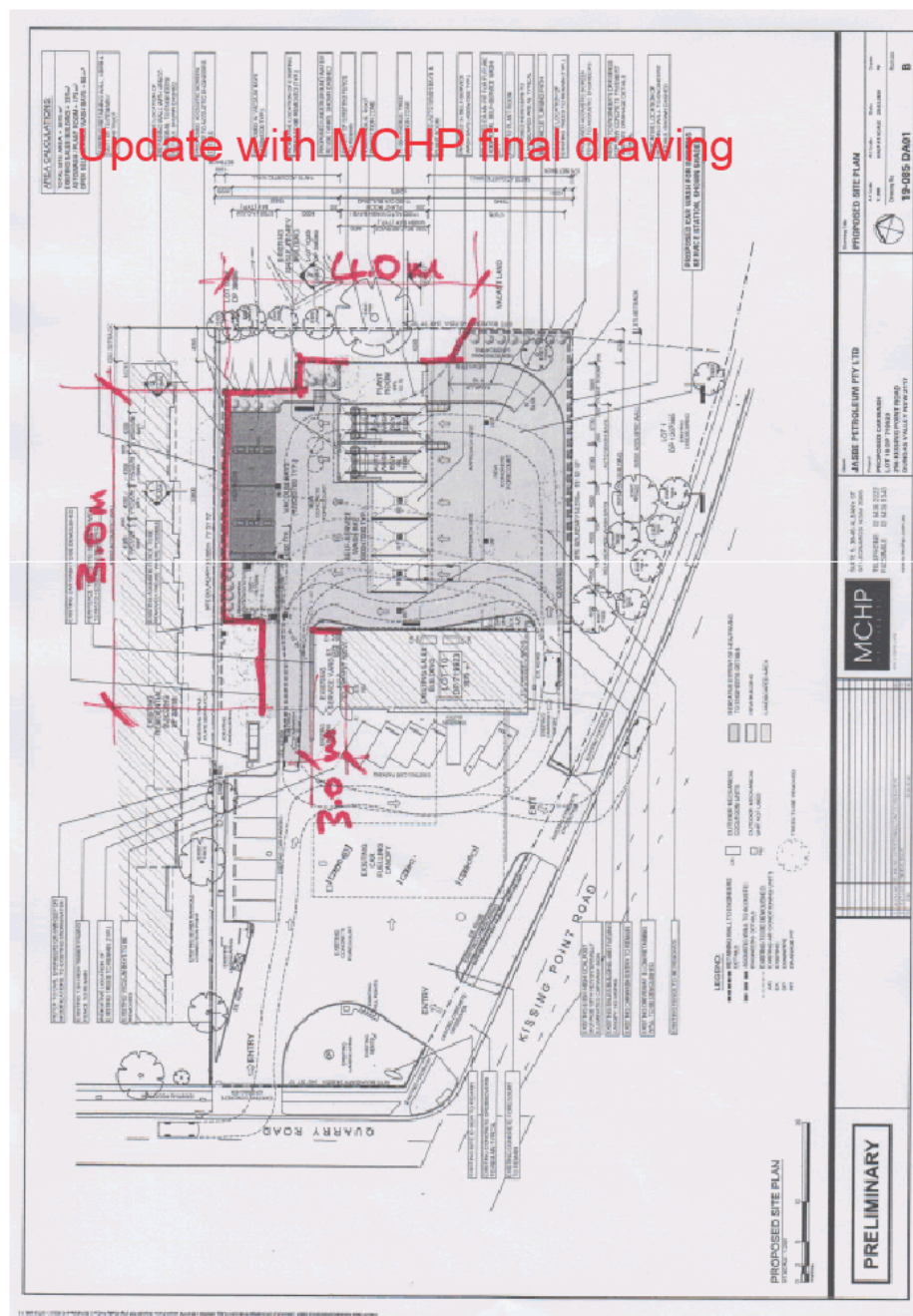
CAR WASH NOISE ASSESSMENT
BP SERVICE STATION CONVENIENCE STORE
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ATTACHMENT 2

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ATTACHMENT 2: PROPOSED SITE LAYOUT



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CAR WASH NOISE ASSESSMENT
BP SERVICE STATION CONVENIENCE STORE
256 KISSING POINT ROAD
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ATTACHMENT 3

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ATTACHMENT 3: AMBIENT NOISE MONITORING RESULTS

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CAR WASH NOISE ASSESSMENT
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ATTACHMENT 4

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ATTACHMENT 4. NOISE MODELLING CAR WASH PLANT AND ACTIVITIES

Source Number	Description	Number Events	On Time %	SWL dB	Distance m	Dist Atten dB	Noise Control dB	Noise Wall dB	Screen dB	NPf/Time Correction dB	SPL Contrib dB
R1- Quarry Road (Town House)											
1	Auto Car Wash No 1 Entry	1	80	98	46	41		11	15	-0.97	33
2	Auto Car Wash No 1 Exit	1	80	98	40	40	10	11		-0.97	42
3	Auto Car Wash No 1 Entry	1	80	98	43	41		11	15	-0.97	33
4	Auto Car Wash No 1 Exit	1	80	98	43	41	10	11		-0.97	42
5	Car Wash Plant Room	1	80	105	47	41	35			-0.97	35
6	Self Serve Car Wash No 1	1	35	93	35	39		11		-4.56	41
7	Self Serve Car Wash No 2	1	35	93	32	38		11		-4.56	40
8	Self Serve Car Wash No 3	1	35	93	29	37		11		-4.56	39
9	Vacuum No 1	1	40	64	33	38		14		-3.98	16
10	Vacuum No 2	1	40	64	32	38		14		-3.98	19
11	Vacuum No 3	1	40	64	23	35		14		-3.98	16
12	Vacuum No 4	1	40	64	24	36		14		-3.98	14
										Cumulative Predicted Noise Level	Day
										Cumulative Predicted Noise Level	Eve
										Cumulative Predicted Noise Level	Night*
											46
											46
											39

NOTE: *Refer to Section 7.1 for restrictions for night-time hours

ATKINS ACOUSTICS

CAR WASH NOISE ASSESSMENT
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DUNDAS VALLEY

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ATTACHMENT 4. NOISE MODELLING CAR WASH PLANT AND ACTIVITIES

Source Number	Description	Number Events	On Time %	SWL dB	Distance m	Dist Atten dB	Noise Control dB	Noise Wall dB	Screen dB	NPf/Time Correction dB	SPL Contrib dB
R2- Quarry Road (Town House)											
1	Auto Car Wash No 1 Entry	1	80	98	33	38		11	15	-0.97	33
2	Auto Car Wash No 1 Exit	1	80	98	21	34	10	11		-0.97	42
3	Auto Car Wash No 1 Entry	1	80	98	33	38		11	15	-0.97	33
4	Auto Car Wash No 1 Exit	1	80	98	21	34	10	11		-0.97	42
5	Car Wash Plant Room	1	80	105	21	34	35			-0.97	35
6	Self Serve Car Wash No 1	1	35	93	27	37		11		-4.56	41
7	Self Serve Car Wash No 2	1	35	93	30	38		11		-4.56	40
8	Self Serve Car Wash No 3	1	35	93	32	38		11		-4.56	39
9	Vacuum No 1	1	40	64	12	30		14		-3.98	16
10	Vacuum No 2	1	40	64	9	27		14		-3.98	19
11	Vacuum No 3	1	40	64	12	30		14		-3.98	16
12	Vacuum No 4	1	40	64	15	32		14		-3.98	14
Cumulative Predicted Noise Level										Day	48
Cumulative Predicted Noise Level										Eve	48
Cumulative Predicted Noise Level										Night*	41

NOTE: *Refer to Section 7.1 for restrictions for night-time hours

ATKINS ACOUSTICS

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ATTACHMENT 4

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ATTACHMENT 4. NOISE MODELLING CAR WASH PLANT AND ACTIVITIES

Source Number	Description	Number Events	On Time %	SWL dB	Distance m	Dist Atten dB	Noise Control dB	Noise Wall dB	Screen dB	NPfl/Time Correction dB	SPL Contrib dB
R3- Pedrick Place (East)											
1	Auto Car Wash No 1 Entry	1	80	98	21	34		12	15	-0.97	36
2	Auto Car Wash No 1 Exit	1	80	98	17	33	10	12		-0.97	42
3	Auto Car Wash No 1 Entry	1	80	98	25	36		12	15	-0.97	34
4	Auto Car Wash No 1 Exit	1	80	98	21	34	10	12		-0.97	41
5	Car Wash Plant Room	1	80	105	10	28	35			-0.97	41
6	Self ServeCar Wash No1	1	35	93	27	37		10	3	-4.56	39
7	Self ServeCar Wash No2	1	35	93	32	38		10	3	-4.56	37
8	Self ServeCar Wash No3	1	35	93	36	39		10	2	-4.56	37
9	Vacuum No 1	1	40	64	21	34		16		-3.98	10
10	Vacuum No 2	1	40	64	22	35		16		-3.98	9
11	Vacuum No 3	1	40	64	31	38		16		-3.98	6
12	Vacuum No 4	1	40	64	30	38		16		-3.98	6
										Cumulative Predicted Noise Level	Day
										Cumulative Predicted Noise Level	Eve
										Cumulative Predicted Noise Level	Night*
											48
											48
											39

NOTE: *Refer to Section 7.1 for restrictions for night-time hours

ATKINS ACOUSTICS

CAR WASH NOISE ASSESSMENT
BP SERVICE STATION CONVENIENCE STORE
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ATTACHMENT 5

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ATTACHMENT 5. NOISE MODELLING FOR NIGHTTIME TRANSIENT ACTIVITIES

Description	SWL	Distance	Dist Att	Noise Wall	Shielding	Predicted Noise Level	Goal	Compliance
	dBA	m	dBA	dBA	dBA	dBA	dBA	
R1 - Quarry Road								
Entry Driveway								
Car moving (entry)	88	57	43		20	25	60-65	Yes
Exit Driveway								
Car Moving (exist)	88	14	31	14	0	43	60-65	Yes
Self Serve Wash Bay 1								
Speech	80	37	39	12	0	29	60-65	Yes
Car door closing	90	37	39	12	0	39	60-65	Yes
Car starting	95	37	39	12	0	44	60-65	Yes
Car accelerating	95	37	39	12	0	44	60-65	Yes
Exit Wash Bay								
Car accelerating	95	33	38	12	0	45	60-65	Yes
Vacuum Bays 3/4								
Speech	80	21	34	14	0	32	60-65	Yes
Car door closing	90	21	34	14	0	42	60-65	Yes
Car starting	95	21	34	14	0	47	60-65	Yes
Car accelerating	95	21	34	14	0	47	60-65	Yes

ATKINS ACOUSTICS

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ATTACHMENT 5. NIGHT TIME TRANSIENT SITE ACTIVITIES

Description	SWL	Distance	Dist Att	Noise Wall	Shielding	Predicted	Goal	Compliance
	dBA	m	dBA	dBA	dBA	Noise Level dBA	dBA	
R2-Quarry Road								
Entry Driveway								
Car moving (entry)	88	57	43	0	20	25	60-65	Yes
Exit Driveway								
Car Moving (exist)	88	38	50	14	0	34	60-65	Yes
Self Serve Wash Bay 1								
Speech	80	28	37	12	0	31	60-65	Yes
Car door closing	90	28	37	12	0	41	60-65	Yes
Car starting	95	28	37	12	0	46	60-65	Yes
Car accelerating	95	28	37	12	0	46	60-65	Yes
Exit Wash Bay								
Car accelerating	95	21	34	14	0	47	60-65	Yes
Vacuum Bays 3/4								
Speech	80	10	28	16	0	36	60-65	Yes
Car door closing	90	10	28	16	0	46	60-65	Yes
Car starting	95	10	28	16	0	51	60-65	Yes
Car accelerating	95	10	28	16	0	51	60-65	Yes

ATKINS ACOUSTICS

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ATTACHMENT 5

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ATTACHMENT 5. NIGHT TIME TRANSIENT SITE ACTIVITIES

Description	SWL	Distance	Dist Att	Noise Wall	Shielding	Predicted Noise Level	Goal	Compliance
	dBA	m	dBA	dBA	dBA	dBA	dBA	
R3- Pedrick Place								
Entry Driveway								
Car moving (entry)	88	55	43	0	20	25	60-65	Yes
Exit Driveway								
Car Moving (exist)	88	37	39	16	0	33	60-65	Yes
Self Serve Wash Bay 1								
Speech	80	29	37	15	0	28	60-65	Yes
Car door closing	90	29	37	15	0	38	60-65	Yes
Car starting	95	29	37	15	0	43	60-65	Yes
Car accelerating	95	29	37	15	0	43	60-65	Yes
Exit Wash Bay								
Car accelerating	95	27	37	16	0	42	60-65	Yes
Vacuum Bays 3/4								
Speech	80	29	37	16	0	27	60-65	Yes
Car door closing	90	29	37	16	0	37	60-65	Yes
Car starting	95	29	37	16	0	42	60-65	Yes
Car accelerating	95	29	37	16	0	42	60-65	Yes

ATKINS ACOUSTICS



STATEMENT OF ENVIRONMENTAL EFFECTS

Development Application:

Demolition of ancillary structures (carwash and vaccum bays), tree removal, relocation of existing acoustic walls and construction of new car wash service, plant room and vaccum bays, with associated site works, drainage and landscaping

256 Kissing Point Road,
Dundas Vally

September 2020

DMCK Planning Pty Ltd
dmplan@hotmail.com
c/- PO Box 6149
Port Macquarie NSW 2444

Statement of Environmental Effects
 256 Kissing Point Road, Dundas Valley
 Replacement of existing car wash and vacuum bays with new car wash,
 vacuum bays, with associated site works, landscaping and drainage



1.0 INTRODUCTION

- 1.1 This statement has been prepared at the request of the applicant in support of a development application to Parramatta City Council (the "Council") comprising demolition of ancillary structures (carwash and vacuum bays), tree removal, relocation of existing acoustic walls and construction of new car wash service, plant room and vacuum bays, with associated site works, drainage and landscaping, at 256 Kissing Point Road, Dundas Valley.
- 1.2 The site is located at the intersection of Kissing Point Road and Quarry Road, near confluence of Kissing Point Road and Silverwater Road. The site is currently occupied by a BP Service Station with ancillary automatic car wash. The eastern section of the site is undeveloped, generally cleared with a small number of mature trees.
- 1.3 The proposal comprises the demolition of the existing carwash which are located adjacent the northern boundary. That carwash is replaced with the construction of a new carwash service comprising automatic and manual self-service bays and new vacuum bays. The new carwash is to occupy the vacant area of the site.
- 1.4 The new layout of the site will utilise the existing path of travel around the service station building, with new driveways, site works, plant room, drainage, landscaping and signage. The new operation is an updated car wash facility in terms of functionality and acoustics. The proposal requires some tree removal and relocation of existing acoustic walls. There are no changes to the existing service station.
- 1.5 The site is zoned R2 Low Density Residential under Parramatta LEP 2011. A service station is a prohibited use in the R2 zone. Notwithstanding, the site benefits from existing use rights pursuant to Division 4.11 Existing Uses and Section 4.65 of the EP&A Act 1979, for both the service station and the car wash landuses. Evidence supporting the EUR is provided in Section 4.0 of this Statement. This application seeks development consent for additions and alterations to that existing use pursuant to the provisions of the EP&A Regulations 2000.
- 1.6 The site owner and project architect attended a Pre-lodgment meeting with Council officers on 19 February 2020 (Ref: PL/9/2020). Issues raised from that meeting have been addressed in the preparation of this application, including but not limited to the Existing Use Rights, setbacks, screening, stormwater, access, landscaping, acoustics and referrals.
- 1.7 The DA is accompanied by the following plans and reports:
 - Architectural plans, prepared by MCHP Architects, dated September 2020
 - Landscape plans, prepared by Taylor Brammer, dated September 2020
 - Traffic Impact Assessment, prepared by The Transport & Traffic Planning Associates, dated September 2020
 - Acoustic Report, prepared by Atkins Acoustics, dated September 2020
 - Stormwater Management, prepared by Henry & Hymas
 - Waste Management Report, prepared by MCHP Architects
 - Survey Plan, prepared by RealServe, Ref 74730RL, dated March 2019
 - Arborist Report, prepared by Blugum Tree Care and Consultancy, dated September 2020
 - DA Cost Estimate by MCHP Architects, dated September 2020
 - Ground Water Report, prepared by Resolve Environmental, dated April 2020

Statement of Environmental Effects
 256 Kissing Point Road, Dundas Valley
 Replacement of existing car wash and vacuum bays with new car wash,
 vacuum bays, with associated site works, landscaping and drainage



- 1.8 The proposal represents Local Development and is assessed under Part 4 of the *Environmental Planning and Assessment Act, 1979 (EP&A Act 1979)*. This statement has been prepared pursuant to Section 4.12 of the *EP&A Act 1979*, and cl 47 and Schedule 1, Part 1, Clause 2(c) of the *Environmental Planning and Assessment Regulation 2000*, and reviews the applicable environmental planning instruments and development control plans that apply to the subject property as well as the natural and built environmental impacts of the proposal with particular reference to the relevant heads of consideration listed under s4.15 of the *EP&A Act 1979*.
- 1.9 Therefore, it is with confidence and high expectation of support that the subject proposal is submitted to Council for approval.

2.0 DESCRIPTION OF SITE AND LOCALITY

2.1 Site Description

The subject site is legally described as Lot 10 DP 719923, No 256 Kissing Point Road, Dundas Valley. The site is located at the north-eastern corner of the intersection of Kissing Point Road and Quarry Road.

The site is an irregular shaped lot with a site area of 3,970sqm. It has a long frontage to Kissing Point Road (44.84m), secondary frontage to Quarry Road of 24.86m, northern boundary of 95.885m and eastern boundary of 45.72m.

The site falls away from Kissing Point Road to the north. The eastern section of the site is currently vacant, containing a scattering of various sized trees. A BP service station and car wash currently occupy the site with three access points – one entry point from Quarry Road and separated entry and exit driveways from Kissing Point Road.

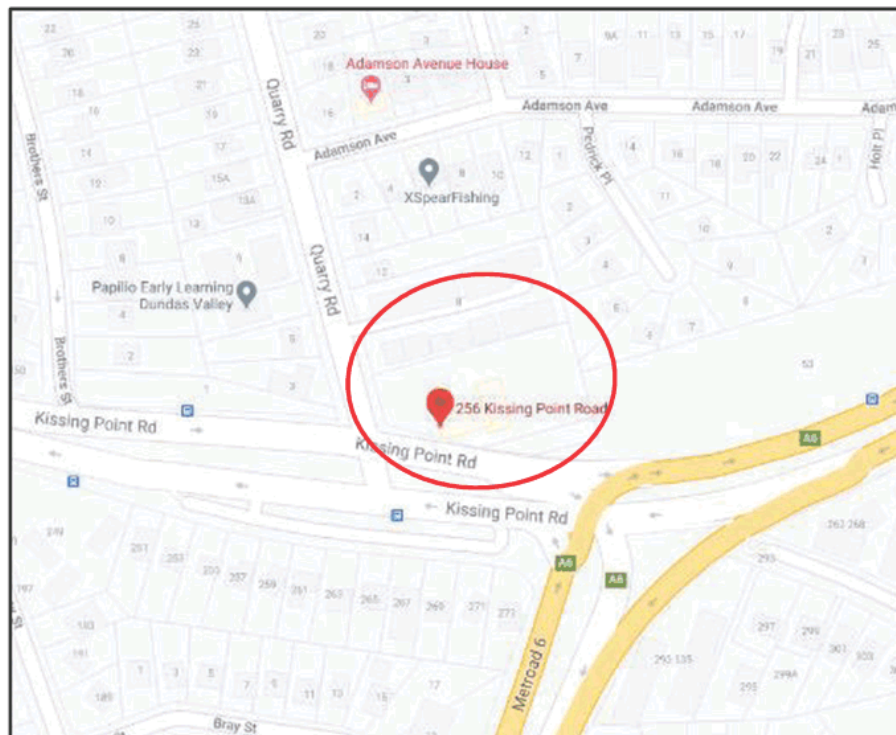


Figure 1: Location of site (Source: google maps)

Statement of Environmental Effects
256 Kissing Point Road, Dundas Valley
Replacement of existing car wash and vacuum bays with new car wash,
vacuum bays, with associated site works, landscaping and drainage



Figure 2: Aerial of the subject site, indicating general area of proposal



Figure 3: View of site from Kissing Point Road



Figure 4: View of site from Quarry Road

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vacuum bays, with associated site works, landscaping and drainage



Figure 5: View of existing service station sales building and side driveway to rear of the site



Figure 6: View of rear of site from Kissing Point Road – area of proposed new car wash

2.2 Surrounding Development

North of the site: medium density villas (No. 4-10 Quarry road)



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South of the site: Kissing Point Road



East of the site (Pedrick Place)



West of the site (3 Quarry Road)



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 Replacement of existing car wash and vacuum bays with new car wash,
 vacuum bays, with associated site works, landscaping and drainage



3.0 **DESCRIPTION OF PROPOSAL**

The following works are proposed under the subject application:

3.1 **Demolition**

- Single automatic car wash building
- Acoustic fence along northern boundary (to be replaced)
- Existing vacuum bays removed
- Southern driveway and retaining wall (to be replaced)
- Existing fence dividing vacant portion of site from existing operation

3.2 **Construction**

- New car wash facility comprising:
 - 2 x automatic wash bays
 - 3 x self-service wash bays
 - Plant room
 - 4 vacuum bays
- Acoustic fence (3 or 4m high – located as per blue dotted line on Site Plan)
- Retaining walls (as indicated on plans – to Engineers details)
- New driveway to rear car wash facility
- New concrete forecourt to car wash facility
- New ramp driveway to plant room

3.2 **Site Works**

- Remove and/or trees (as per site plan and addressed in the Arborist Report)
- Grade and prepare site
- New driveway to car wash facility
- New concrete forecourt to car wash facility
- New OSD tank
- New sign panel to existing 8.85m goalpost sign (internally lit)
- New stormwater drainage of car wash area and street
- Landscaping (as per submitted plans)

3.3 **Operation of the site**

Hours of operation:

Service station: existing hours: 24 hours per day, 7 days per week (No change to the service station trading hours)

Car wash: proposed trading hours (as recommended by the Acoustic consultant)

- *Automatic car wash/dryer bays* - 7.00am - 10.00pm, Monday to Saturday, and 8.00am - 10.00pm Sundays and Public Holidays.
- *Self-serve wash bays*: 7.00am - 10.00pm, Monday to Saturday, and 8.00am to 10.00pm Sundays and Public Holidays.
- *Vacuum bays* - 7.00am - 10.00pm Monday to Saturday, and 8.00am - 10.00pm Sundays and Public Holidays.

Staff: Service Station & car wash: 2-3 (at any time of day)

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vacuum bays, with associated site works, landscaping and drainage



3.4 Plans

19-085-DA01-B	Proposed Site Plan
19-085-DA02-B	Proposed Building & Carwash Floor Plans
19-085-DA03-B	Proposed Retail Building Elevations & Typical Section
19-085-DA04-B	Proposed Carwash Elevations & Typical Section

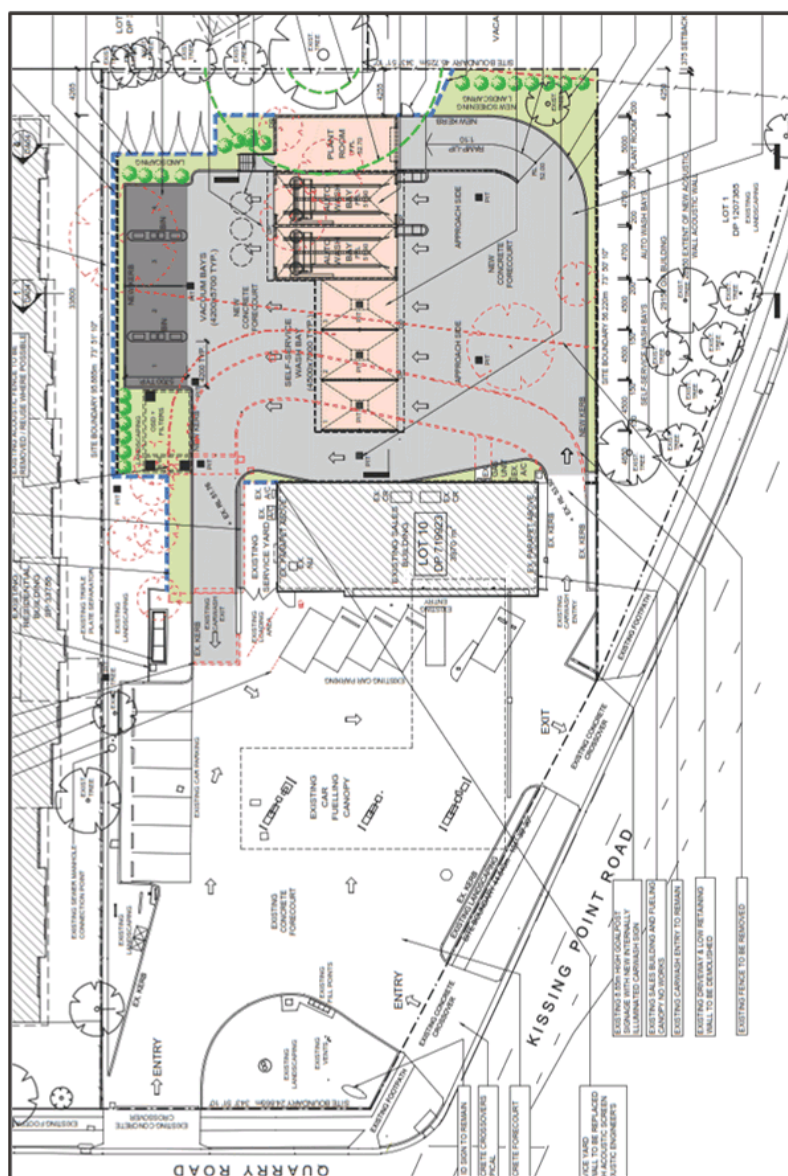


Figure 7: Extract of proposed site plan (Source: MCHP Architects, Drawing No. 19-085 DA01 Rev B)

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 Replacement of existing car wash and vacuum bays with new car wash,
 vacuum bays, with associated site works, landscaping and drainage

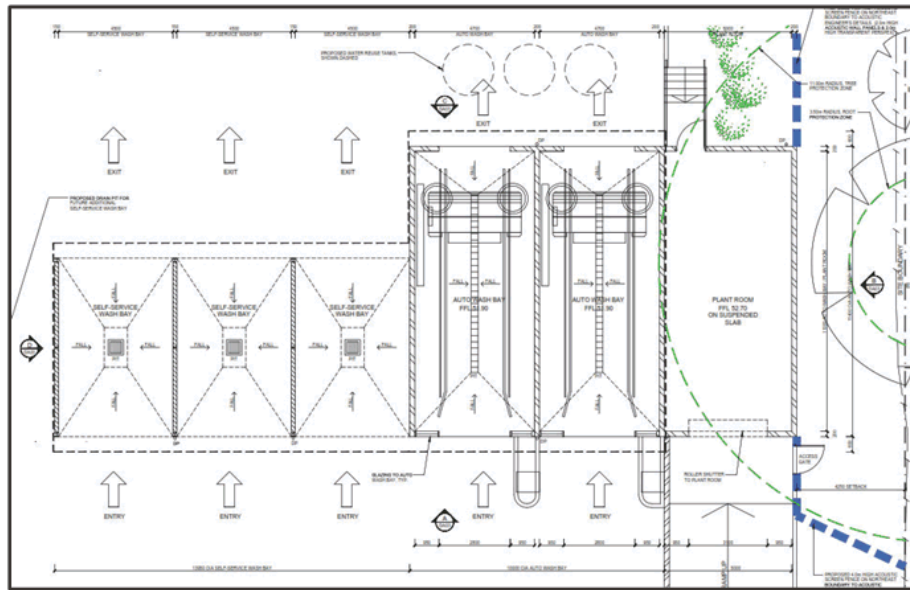


Figure 8: Floor plan of new car wash
 (Source: MCHP Architects, Drawing No. 19-085 DA02 Rev B)

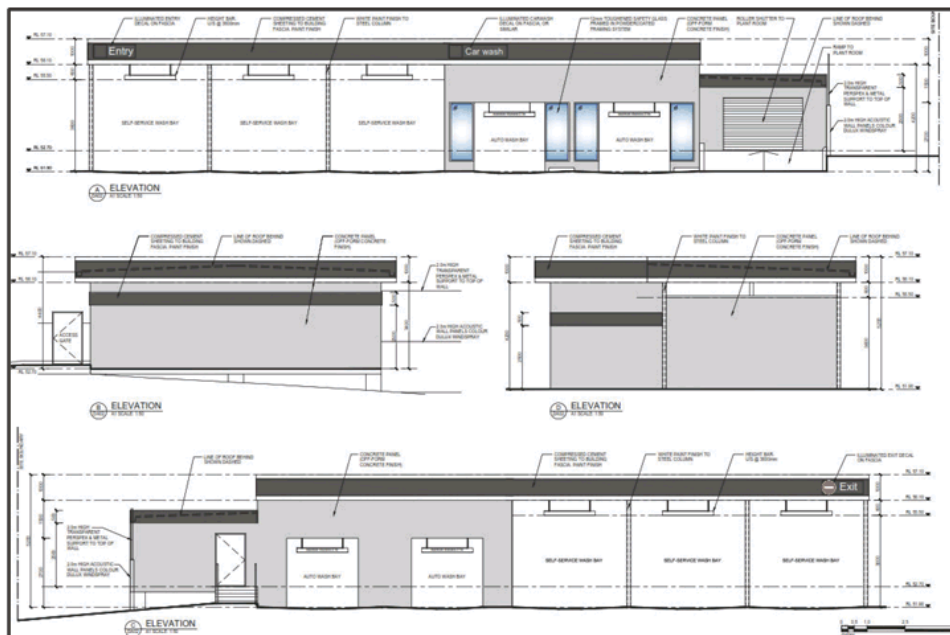


Figure 9: Elevations new car wash
 (Source: MCHP Architects, Drawing No. 19-085 DA03 Rev B)

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 Replacement of existing car wash and vacuum bays with new car wash,
 vacuum bays, with associated site works, landscaping and drainage

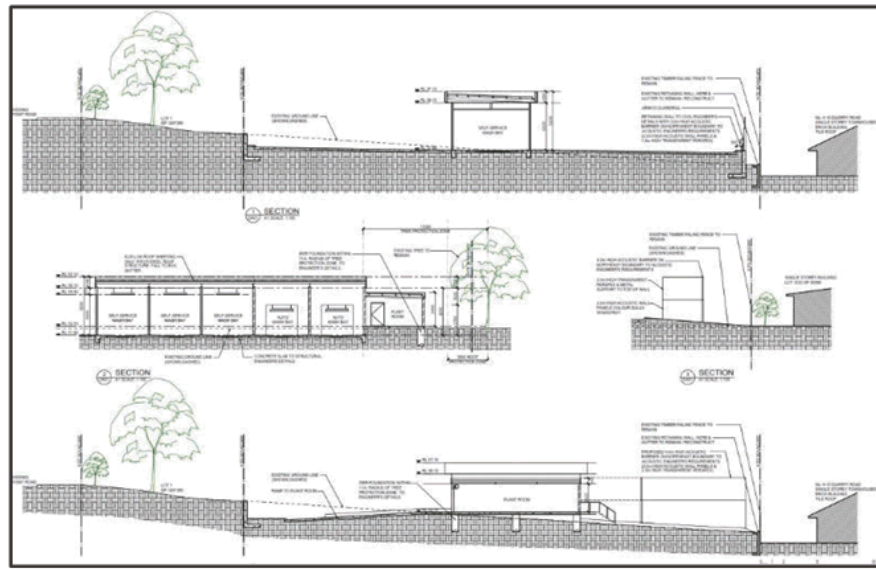


Figure 10: Section plans of new car wash
 (Source: MCHP Architects, Drawing No. 19-085 DA04 Rev B)

4.0 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 – EXISTING USE RIGHTS

The site is located within a R2 Low Density Residential under the Parramatta LEP 2011. A service station, with ancillary car wash, is a prohibited use in that zone.

A "Service Station" means a building or place used for the sale by retail of fuels and lubricants for motor vehicles, whether or not the building or place is also used for any one or more of the following—

- (a) the ancillary sale by retail of spare parts and accessories for motor vehicles,
- (b) the cleaning of motor vehicles,
- (c) installation of accessories,
- (d) inspecting, repairing and servicing of motor vehicles (other than body building, panel beating, spray painting, or chassis restoration),
- (e) the ancillary retail selling or hiring of general merchandise or services or both.

Pursuant to Section 4.65(b)(i) of the EP&A Act 1979, the service station is defined as an "existing use", as follows:

Section 4.65 Definition of "existing use"

"existing use" means:

- (a) the use of a building, work or land for a lawful purpose immediately before the coming into force of an environmental planning instrument which would, but for Division 4 of this Part, have the effect of prohibiting that use, and
- (b) the use of a building, work or land:
 - (i) for which development consent was granted before the commencement of a provision of an environmental planning instrument having the effect of prohibiting the use, and
 - (ii) that has been carried out, within one year after the date on which that provision commenced, in accordance with the terms of the consent and to such an extent as to ensure (apart from that provision) that the development consent would not lapse.

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 vacuum bays, with associated site works, landscaping and drainage



The relevant LEP came into force on the date of its gazettal, that is, 7.10.2011. It has been established that the land was used for a lawful purpose (service station) prior to commencement of the current LEP. A search of Council's records shows that a car wash and service station have been lawful landuses on the site since at least 1991:

DA/38716/1991
 INSTALLATION OF A CAR WASH FAC ILITY (Submitted: 05/11/1991)
 DA/40/1996
 (BP Australia) Installation of an underground tank (Submitted: 16/01/1996)
 DA/78/1996
 Replacement panels to the existing signage (Submitted: 07/02/1996)
 DA/68/1997
 To install a 30KL underground tank and associated dispenser at the existing BP Station. (Submitted: 17/02/1997)
 DA/3003/2002
 Internal alterations and refurbishment of existing petrol station. (Submitted: 16/12/2002)
 DA/2195/2003
 To provide roof over and enclosed with wall area 23sqm (Submitted: 12/12/2003)
 TA/927/2007
 Pruning of 4 Tree/s (Submitted: 13/12/2007)

Based on the above, the service station, with ancillary car wash, have 'existing use rights'.

The applicant seeks to make alterations and additions to the service station (car wash) as detailed in Section 3 of this Statement. Section 41 (Certain development allowed) of the *EP&A Regulation 2000* provides that an existing use may be enlarged, expanded, intensified, altered, extended, rebuilt or changed to another use. Section 42(1) requires development consent for any of these developments and Section 42(2) requires that an enlargement, expansion or intensification must be for the existing use and carried out on the land on which the existing use was carried out immediately before the relevant date. In this case, the subject site (Lot 10).

It is noted that a 'service station' is not defined as a 'commercial use' or 'light industrial use' (as defined in the standard instrument set out in the Standard Instrument (Local Environmental Plans) Order 2006). A service station is a separately defined landuse, which includes the cleaning of vehicles (that is, the car wash). Therefore, Section 41(2) of the *EP&A Regulations*, which serves to restrict changes of these defined premises to alterations or additions of a minor nature and, not involving an increase of more than 10% in the floor space of the premises, does not apply to this application.

5.0 **SECTION 4.15 ASSESSMENT – HEADS OF CONSIDERATION**

In accordance with s4.15 of the *EP&A Act 1979* the following matters shall be considered in determination of the development application.

4.15 Evaluation

(1) Matters for consideration—general

In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

(a) the provisions of:

- (i) any environmental planning instrument, and*
- (ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
- (iii) any development control plan, and*
- (iiia) any planning agreement that has been entered into under section 4.7, or any draft planning agreement that a developer has offered to enter into under section 4.7, and*

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- (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and*
- (v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates,*
- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
- (c) the suitability of the site for the development,*
- (d) any submissions made in accordance with this Act or the regulations,*
- (e) the public interest.*

5.1 Relevant Statutory Environmental Planning Policies

The following statutory planning policies have been considered as part of the assessment:

5.1.1 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

SEPP 33 was introduced to ensure that DAs for potentially hazardous and/or offensive developments are properly assessed in relation to off-site risk and offence. Hazardous and Offensive Development Application Guidelines - Applying SEPP 33 (Department of Planning 2011) provides advice on the application of SEPP 33 and assists in identifying developments which should be considered under SEPP 33.

The proposal the subject of this application pertains to the replacement of the car wash facility at the rear of the existing service station. There are no building works or other changes to the storage of hazardous materials on the site that would warrant the preparation of a Preliminary Hazard Analysis as part of this application.

5.1.2 SEPP 55 – Remediation of Land

Under Clause 7 of SEPP 55 Council is required to consider whether a proposed development site is affected by soil or other contaminants before granting consent.

The site of the new car wash facility is located at the rear of the service station, on part of the property that is currently vacant. Assessment of the likely contamination of the land would have formed part of those works for the development of original service station. Any identification of matters to be addressed would have been undertaken as part of those works. On this basis, further investigation of the site in relation to potential contamination is not proposed as part of this development application.

5.1.3 SEPP Infrastructure (2007)

Council, in the Pre-lodgment Minutes advised that the development is subject to Clause 45 Determination of development applications—other development, as follows:

- (1) This clause applies to a development application (or an application for modification of a consent) for development comprising or involving any of the following—*
 - (a) the penetration of ground within 2m of an underground electricity power line or an electricity distribution pole or within 10m of any part of an electricity tower,*
 - (b) development carried out—*
 - (i) within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists), or*
 - (ii) immediately adjacent to an electricity substation, or*
 - (iii) within 5m of an exposed overhead electricity power line,*
 - (c) installation of a swimming pool any part of which is—*

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- (i) within 30m of a structure supporting an overhead electricity transmission line, measured horizontally from the top of the pool to the bottom of the structure at ground level, or*
- (ii) within 5m of an overhead electricity power line, measured vertically upwards from the top of the pool,*
- (d) development involving or requiring the placement of power lines underground, unless an agreement with respect to the placement underground of power lines is in force between the electricity supply authority and the council for the land concerned.*
- (2) Before determining a development application (or an application for modification of a consent) for development to which this clause applies, the consent authority must—*
 - (a) give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting comments about potential safety risks, and*
 - (b) take into consideration any response to the notice that is received within 21 days after the notice is given.*

On this basis, the application will be referred to the local energy authority.

Clause 101 of the SEPP relates to development fronting a classified road, as follows:

101 Development with frontage to classified road

- (1) The objectives of this clause are—*
 - (a) to ensure that new development does not compromise the effective and ongoing operation and function of classified roads, and*
 - (b) to prevent or reduce the potential impact of traffic noise and vehicle emission on development adjacent to classified roads.*
- (2) The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that—*
 - (a) where practicable and safe, vehicular access to the land is provided by a road other than the classified road, and*
 - (b) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of—*
 - (i) the design of the vehicular access to the land, or*
 - (ii) the emission of smoke or dust from the development, or*
 - (iii) the nature, volume or frequency of vehicles using the classified road to gain access to the land, and*
 - (c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.*

This application will be referred to the NSW RMS (TfNSW).

The Traffic and Parking Assessment Report states that the existing access to the site accords with the requirements of AS2890.1 and have good sight distances for egressing drivers. The internal circulation can cater for B99, 4WD and vans.

The estimated traffic generation as a result of the new car wash is calculated to be 21 additional vehicles per hour on a peak time (Saturday mornings) and 10 additional vehicles during weekday network peaks. The total would be discounted for the existing car wash, establishing that the site can cater for the new facility, at peak periods. The report concludes that "there will not be unsatisfactory traffic implications."

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5.1.4 Parramatta LEP 2011

Parramatta LEP is the local planning instrument that applies to the site. It is noted that this site has existing use rights pursuant to the provisions of the EP&A Act, 1979.

Table 1: Parramatta LEP 2011

LEP 2011 Provisions	Proposal	Complies
<p><i>Aims of the Plan</i></p> <p><i>(1) This Plan aims to make local environmental planning provisions for land in Parramatta in accordance with the relevant standard environmental planning instrument under section 3.20 of the Act.</i></p> <p><i>(2) The particular aims of this Plan are as follows:</i></p> <p><i>(a) to encourage a range of development, including housing, employment and recreation, that accommodates the needs of the existing and future residents, workers and visitors of Parramatta,</i></p> <p><i>(b) to foster environmental, economic, social and physical wellbeing so that Parramatta develops as an integrated, balanced and sustainable city,</i></p> <p><i>(c) to identify, conserve and promote Parramatta's natural and cultural heritage as the framework for its identity, prosperity, liveability and social development,</i></p> <p><i>(d) to improve public access to the city and facilitate the maximum use of improved public transport, together with walking and cycling,</i></p> <p><i>(e) to minimise risk to the community in areas subject to environmental hazards, particularly flooding and bushfire, by restricting development in sensitive areas,</i></p> <p><i>(f) to protect and enhance the natural environment, including areas of remnant bushland in Parramatta, by incorporating principles of ecologically sustainable</i></p>	<p>The proposal satisfies the stated objectives given that:</p> <ul style="list-style-type: none"> the existing operation of the site services the local residents of Dundas and surrounds; the service station and car wash are longstanding services to the area; design, layout and proposed site works that are part of this application address site specific opportunities and constraints; 	Yes


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<p>development into land use controls, (g) to improve public access along waterways where natural values will not be diminished, (h) to enhance the amenity and characteristics of established residential areas, (i) to retain the predominant role of Parramatta's industrial areas, (j) to ensure that development does not detract from the economic viability of Parramatta's commercial centres, (k) to ensure that development does not detract from the operation of local or regional road systems, (l) to ensure development occurs in a manner that protects, conserves and enhances natural resources, including waterways, riparian land, surface and groundwater quality and flows and dependant ecosystems, (m) to protect and enhance the viability, identity and diversity of the Parramatta City Centre and recognise it as the pre-eminent centre in the Greater Metropolitan Region, (n) to encourage development that demonstrates efficient and sustainable use of energy and resources in accordance with ecologically sustainable development principles.</p>		
<p>Zone R2 Low Density Residential</p>	<p>The site is zoned R2 Low Density Residential. The service station, with ancillary car wash facility, is prohibited in the R2 zone.</p> <p>The site has Existing Use Rights. Refer to Section 4 of this Statement. The proposal is therefore permissible with the consent of Council.</p>	<p>Yes</p>

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<p>4.3 Height of buildings</p>  <p>Map – "J1" = 9m</p> <p>(2) The height of a building on any land is not to exceed the maximum height shown for the land on the <u>Height of Buildings Map</u>.</p>	<p>The site has a maximum permissible building height of 9m.</p> <p>The height of the car wash is 5.2m.</p> <p>Overall, the development is well below the maximum permitted for the site, thereby not restricting views to or from the corner of Kissing Point Road and Quarry Road.</p>	Yes
<p>4.4 Floor space ratio</p> <p>Permitted 0.5:1.</p>	<p>Site area: 3,970sqm Permitted GFA: 1,985sqm.</p> <p>Ex Sales Building = 237 sqm. Proposed Carwash = 269 sqm. Proposed Vacuum Bays = 106 sqm. Total GFA = 612 sqm.</p> <p>Proposed FSR = 0.15:1</p> <p>If Council is of a mind to include the car fueling canopy area as GFA then this would add 360 sqm, equating to a GFA of 972sqm and FSR 0.25:1</p> <p>The development of the whole site is well below the allowable GFA and FSR for the site.</p>	Yes
<p>5.10 Heritage conservation</p>	<p>The site is not a heritage item, is not within a conservation area and is not located within proximity to any listed heritage items.</p> <p>No assessment required.</p>	Yes
<p>6.2 Earthworks</p>	<p>Site works for the construction of the new car wash and driveway are part of the DA application.</p>	Yes

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4.2 Non-Statutory Development Control Plans

4.2.1 Parramatta DCP 2011 (as amended 3.7.20)

PDCP 2011 is the local planning policy that provides guidance to all development within the Parramatta LGA. In this case, the DCP does not contain any specific provisions for the development of service stations and/or car wash facilities. Therefore, the proposal is assessed against the general provisions in Part 2 Site Planning and any other relevant head of consideration under s4.15 of the *EP&A Act 1979*.

Table 2: Parramatta DCP 2011

Provision	Comment	Complies
PART 2 SITE PLANNING		
2.3 Site Analysis		
	<p>The site contains a long-standing service station and car wash facility. It has existing use rights on the R2 Low Density Residential land. The site fronts Kissing Point Drive and provides an essential service to local residents and commuters.</p> <p>The site adjoins residential villas and houses to the north and north-east. These have a longstanding relationship with the site and its operation.</p> <p>To the west is low density housing along Quarry Road – a high traffic local road with the Dundas Valley area.</p> <p>To the east is vacant land</p>	Yes
2.4 Site Considerations		
2.4.1 Views and Vistas	There are no significant views or vistas that will be impacted by the proposal.	Yes
2.4.2 Water Management 2.4.2.1 Flooding 2.4.2.2 Protection of Waterways 2.4.2.3 Protection of Groundwater	<p>The site is not subject to flooding and does not contain and waterway.</p> <p>Ground water: Submitted with the DA documentation is a report on Ground Water Monitoring, prepared by Resolve Environment, dated April 2020. The conclusions of that investigation are:</p> <p>“• LNAPL was not identified in any of the monitoring wells or tank-pit well; • Concentrations of TRH and BTEXN were reported to be below the laboratory LOR and/or the adopted screening criteria at MW01, MW03 and MW04; and • Reported concentrations of TRH/BTEXN were generally consistent with those historically reported.”</p>	

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2.4.3 Soil Management		
2.4.3.1 Sedimentation	The site not subject to Acid sulfate soils or salinity.	Yes
2.4.3.2 Acid Sulfate Soils		
2.4.3.3 Salinity	The site works are to be subject to a soil and sedimentation erosion plan. Retaining wall are to be constructed (as per the site plan).	
2.4.4 Land Contamination		
	The site is a longstanding service station and car wash. The proposal is upon the vacant land at the rear. A PSI report is not submitted with the DA package, however the ground water monitoring report submitted serves to demonstrate that the land does not contain contaminants that prevent the development.	Acceptable in this case.
2.4.5 Air Quality		
	No impact.	NA
2.4.6 Development on Sloping Land		
	NA	NA
2.4.7 Biodiversity		
	<p>The application includes tree removal and tree protection. An Arborist Report, prepared by Blue Gum Consultants, dated September 2020 is submitted with the DA package.</p> <p>The report assessed 26 trees either within the site boundaries, adjoining properties or within the road reserve along Kissing Point Road.</p> <p>Twelve (12) trees, within the site boundary are to be removed. The remainder of the trees are retained and protected – either by specific fencing or construction methods.</p>	Yes
2.4.8 Public Domain		
	The only works proposed with public land is the tree protection fencing proposed for trees No. 19 – 26. If Council has any issue with this, then the fencing will not be erected. A condition of consent can be imposed in that case.	Yes

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PART 3 DEVELOPMENT PRINCIPLES		
3.1 Preliminary Building Envelope		
3.1.1 Height	The height of the new car wash is well below the 9m max height limit for the site.	Yes
3.1.2 Height Transition	Due the location of the new building on the site and the vacant land to the east of the site, there is no overshadowing impacts from the development.	
3.1.3 Preliminary Building Envelope Tables		
3.2 Building Elements		
3.2.1 Building Form and Massing	The built form of the development is acceptable for its development typology – being a new car wash facility.	Yes
3.2.2 Building Facades and Articulation	The roof of the car wash has a 2 ^o pitch. The materials, colours and finishes of the new building are non reflective and generally 'earthy' tones.	Yes
3.2.3 Roof Design		
3.2.4 Energy Efficient Design	The new building is setback from the Kissing Point Road frontage and the adjoining residential development. The new car wash will not be visible from Quarry Road.	Yes
3.2.5 Streetscape		
3.2.6 Fences	Fencing around the site is generally retained where possible; otherwise it is replaced as notated on the Site Plan. Acoustic fencing is proposed along the northern, eastern boundaries, as notated on the Site Plan.	Yes
3.3 Environmental Amenity		
3.3.1 Landscaping	Existing landscaping around the perimeter of the site has been revised. Refer to Landscape Plans, prepared by Taylor Brammer.	Yes
3.3.2 Private and Communal Open Space		
3.3.3 Visual and Acoustic Privacy	An Acoustic Report, prepared by Atkins Acoustics is submitted with the DA package. The report contains a number of recommendations (Section 7.1 of the Report) which have been adopted for the development. these include acoustic fencing and hours of operation of the car wash and vacuum facilities. Subject to adoption of the recommendations the Acoustic consultant supports the proposal.	Yes
3.3.4 Acoustic Amenity		
3.3.5 Solar Access and Cross Ventilation		
3.3.6 Water Sensitive Urban Design		
3.3.6.1 Stormwater Drainage	Stormwater drainage for the service station section of the property remains unchanged. Drainage of the car wash facility is detailed in the stormwater	Yes

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3.3.6.2 Water Efficiency	management plan submitted with the DA package.	
3.3.6.3 Grey Water		
3.3.7 Waste Management	Water efficiency is built into the proposal with three water reused tanks sited on the northern side of the auto car wash bays.	Yes
	The minor amount of waste produced by the car wash will be incorporated with the existing service station/convenience store waste and will not require any additional waste collection. Deliveries will be limited to cleaning products which will be accommodated in the large hardstand area.	Yes
3.4 Social Amenity		
3.4.1 Culture and Public Art	The auto car wash bays do not require occupants of a vehicle to leave the vehicle. They are therefore accessible for people with a disability. The remainder of the site is relatively flat and able to be traversed. There is no change to access arrangements for the sales building.	Yes
3.4.2 Access for People with Disabilities		
3.4.3 Amenities in Buildings Available to the Public	The operation of the service station, with 24/7 trading provides an active site at all times. CCTV cameras will be fitted to allow for monitoring of the car wash at all times. The area will be well lit internally to assist with the monitoring of the site.	
3.4.4 Safety and Security		
3.4.5 Housing Diversity and Choice		
3.5 Heritage		
	The site is not a heritage item, is not within a HCA and is not located within proximity to any heritage item.	NA
3.6 Movement and Circulation		
3.6.1 Sustainable Transport	A Traffic and Parking report, prepared by TTPA, Ref 20114 is submitted with the DA package.	Yes
3.6.2 Parking and Vehicular Access	The large hardstand area behind the 5 car wash bays allows for queuing of up to 3 cars + the cars in the wash bays and up to 4 cars at a time in the vacuum bays.	
3.6.3 Accessibility and Connectivity	The holding capacity of the site is therefore more than adequate for the use, including possible peak car wash demand times (eg Saturday morning after a period of rainfall).	

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	The internal circulation for vehicles is designed to be generous – catering for B99, 4WD and vans.	
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4.3 The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality. Suitability of the site for the development.

The service station and ancillary car wash are both longstanding landuses on the site.

The potential impact of the new car wash has been assessed by a number of consultants with their findings and recommendations integrated into the layout of the site, particularly relating to acoustics, screening, landscaping, stormwater and internal circulation.

The operation of the site includes water recycling and revised stormwater drainage for the car wash facility. Both these address the environmental performance of the development.

The hours of operation proposed in the application are based on the recommendations of the Acoustic consultant. Acoustic fencing, 3-4m high, is to be installed around various sections of the site – as per the DA Site Plan. These address the potential noise impacts from the site.

In response to social impacts, the service station and car wash facility have been in place, providing a local and convenient service to the residents of the area for over 30 years. The new car wash will upgrade the existing facility, allowing additional capacity for a growing population.

With the mitigation measures in place, the new car wash facility is capable of operating on the site without undue impacts on the adjoining residential properties. This development remains suitable for the site and the scale of development is reasonable in this case.

4.4 Any submissions made in accordance with this act or the regulations

Council is responsible for the referral of the application to relevant Government bodies and to adjoining owners. Given the location of the site adjoining a classified road, the application will be referred to both Departments for comments. Any submissions will be reviewed by the applicant and Council during the assessment process, and duly considered.

4.5 The public interest

Given that the relevant issues have been addressed with regard to the public interest as reflected in the relevant planning policies and codes, the development is unlikely to result in any adverse impact to the public interest in the circumstance of the case. Suitable conditions of consent will ensure that the noise emissions are contained to a reasonable level.

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5.0 **CONCLUSION**

The proposal seeks approval for alterations and additions to the existing car wash facility that functions as an ancillary use to the existing service station. The landuses enjoy the benefits of existing use rights pursuant to the provisions of the *EP&A Act 1979* and *EP&A Regulations 2000*.

The DA documentation and plans submitted as part of the application provide a comprehensive assessment of the development, its potential impacts and relevant mitigation measures and/or design solutions where appropriate. There are substantial community benefits and improvements that accompany the development of this site, as outlined throughout this Statement.

The proposal is consistent with the existing and ongoing use of the land, seeking to utilise the rear of the site which is currently vacant. The new car wash will provide an updated local service and facility. A number of mitigation measures are proposed in relation to noise impacts, stormwater, water reuse and tree protection. Each of these serve to address matters raised by Council at pre-lodgement and ensure that the environmental matters are adequately resolved.

Given the relevant planning policies, codes and requirements of the *EP&A Act 1979* have been duly satisfied, the proposed application is worthy of approval.

DJ McKenzie
Planning Consultant
DMCK Planning Pty Ltd

DEVELOPMENT APPLICATION

ITEM NUMBER	5.2
SUBJECT	OUTSIDE PUBLIC MEETING: 37A Grand Avenue, CAMELLIA (Lot 2 DP 539890)
DESCRIPTION	Change of Use to a Freight Transport Facility. The development is identified as Designated Development in accordance with Clause 2.7 of the State Environmental Planning Policy (Resilience and Hazards) 2021.
REFERENCE	DA/1055/2021 - D08416648
APPLICANT/S	Streamline Container Services
OWNERS	Camellia Grande Pty Ltd
REPORT OF	Group Manager Development and Traffic Services
RECOMMENDED	REFUSAL

REASON FOR REFERRAL TO LPP

In accordance with Schedule 2 of the *Local Planning Panels Direction 2020*, the application is referred to the Parramatta Local Planning Panel as the development is identified as Designated Development.

EXECUTIVE SUMMARY

This is a summary of the full assessment of the application as outlined in Attachment 1, the Section 4.15 Assessment Report.

The Property

The subject property is known as 37A Grand Avenue, Camellia (Lot 2 DP 539890). The property is an industrial allotment with an approximate site area of 32,800m² and adjoins the Parramatta River to the rear. The property has four (4) vehicular access points to Grand Avenue and has been divided into six (6) areas that are all leased separately.

The subject property and its surrounding properties located along the southern side of Parramatta River are zoned as IN3 Heavy Industry. Properties within vicinity to the north of the subject property are zoned as W2 Recreational Waterways, RE1 Public Recreation, R2 Low Density Residential and IN1 General Industrial.

The property is actively declared as a remediation site under the Contaminated Lands Management Act 1997.

The Proposal

- Retrospective approval for the use of part of the site (lease area no. 2) as a freight transport facility

The freight transport facility operator will have thirteen (13) staff with the hours of operation of 27 hours a day, 7 days a week. The use will have heavy and light vehicle movements in and out of the site throughout the day.

Permissibility

The subject property is zoned as IN3 Heavy Industrial under the Parramatta Local Environmental Plan 2011. The proposal being defined as *freight transport facility* is a permissible development within the IN3 zone.

The proposed land use is not consistent with the objectives of IN3 Heavy Industrial zoning.

Notification

The subject site was notified and advertised in accordance with Schedule 1 of the Environmental Planning and Assessment Act 1979. In response, five (5) submissions were received with concerns primarily relating to acoustic impacts and hours of operation.

Assessment

The application was assessed against the relevant environmental planning instruments including the State Environmental Planning Policy (Resilience and Hazards) 2021, State Environmental Planning Policy (Biodiversity and Conservation) 2021 and the Parramatta Local Environmental Plan 2011 as well as the applicable Parramatta Development Control Plan 2011. The development proposal in its current form does not comply with the provisions within the environmental planning instruments and development control plan.

The application is recommended for refusal on the basis of insufficient information preventing a complete assessment to be undertaken.

RECOMMENDATION

- (a) **That** the Parramatta Local Planning Panel (PLPP), exercising the functions of Council, **refuse** development consent to DA/1055/2021 for development consent for use of part of the site as a freight transport facility at 37A Grand Avenue, Camellia NSW 2142.
- (b) **Further, that** submitters be advised of the decision.

REASONS FOR REFUSAL

1. State Environmental Planning Policy (Resilience and Hazards) 2021

- a. Pursuant to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979*, insufficient information has been submitted to demonstrate that the site is suitable for the proposed use under the provisions of Clause 4.6 of SEPP (Resilience and Hazards) 2021.

2. State Environmental Planning Policy (Biodiversity and Conservation) 2021

- a. Pursuant to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979*, insufficient information has been submitted to demonstrate that the property and proposed use are consistent with the

provisions of Clause 2.7, 2.8 & 2.10 of SEPP (Biodiversity and Conservation) 2021.

3. Parramatta Local Environmental Plan 2011

- a. Pursuant to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979*, the proposed development does not meet compliance and/or consist of insufficient information to determine its compliance to the following matters of the *Parramatta Local Environmental Plan 2011*:
- i. Objectives IN3 Heavy Industrial: The proposed land use has not taken into consideration the context and setting of the subject site as the use will generate undue adverse effects of industry on the R2 Low Density Residential zoned properties to the north of the site as a result of acoustic and dust impacts.
 - ii. Clause 5.10 Heritage conservation: Insufficient information has been submitted to demonstrate that the contaminated material on site will not cause adverse impact to *11 Wetlands* located along the property's Parramatta River foreshore.
 - iii. Clause 5.21 Flood planning: Insufficient information has been submitted to demonstrate that the use is appropriate to the property's flood affectation.
 - iv. Clause 6.2 Earthworks: Insufficient information has been submitted to demonstrate that the earthworks undertaken on the property without consent are in accordance with Clause 6.2(3) of LEP 2011, and that it will not create detrimental effects to the Parramatta River.
 - v. Clause 6.5 Water Protection: Insufficient information has been submitted to demonstrate that the existing capping on site is sufficient to contain the contaminated material from seeping into the riparian land.
 - vi. Clause 6.7 Affected by a foreshore building line: Insufficient information has been submitted to demonstrate that the existing capping on site is sufficient to contain the contaminated material and will not cause adverse impact to the surrounding foreshore area.

4. Parramatta Development Control Plan 2011

- a. Pursuant to Section 4.15(1)(a)(iii) of the *Environmental Planning and Assessment Act 1979*, the proposed development does not meet compliance and/or consist of insufficient information to determine its compliance to the following matters of the *Parramatta Development Control Plan 2011*:
- i. Section 2.4.2 Water Management
 - ii. Section 2.4.3 Soil Management
 - iii. Section 3.3.3 Visual and Acoustic Privacy
 - iv. Section 3.3.6 Water Sensitive Urban Design

v. Section 3.3.7 Waste Management

vi. Section 3.5 Heritage

5. Environmental Planning and Assessment Act 1979

- a. Pursuant to Section 4.15(1)(b) and (c) of the *Environmental Planning and Assessment Act 1979*, the site is not considered suitable for the proposed development.
- b. Pursuant to Section 4.15(1)(d) and (e) of the *Environmental Planning and Assessment Act 1979*, the adverse impacts generated by the development due to non-compliance with the applicable planning controls are detrimental to the established residential community within the vicinity and as such, it is not considered to be in the wider public interest.

John Martinez

Senior Development Assessment Officer

ATTACHMENTS:

1 <u>↓</u>	Assessment Report	19 Pages
2 <u>↓</u>	Plan used during assessment	1 Page
3 <u>↓</u>	Environmental Impact Statement	73 Pages
4 <u>↓</u>	Planning Secretary's Environmental Assessment Requirements	7 Pages
5 <u>↓</u>	Acoustic Report	5 Pages
6 <u>↓</u>	Transport Statement	12 Pages
7 <u>↓</u>	Ecological Impact Assessment	41 Pages

REFERENCE MATERIAL



City of Parramatta	
File No:	DA/1055/2021

SECTION 4.15 ASSESSMENT REPORT

Environmental Planning & Assessment Act 1979

1. Summary

DA No:	DA/1055/2021
Subject Property:	Lot 2 DP 539890, 37A Grand Avenue, CAMELLIA NSW 2142
Subject Site:	Lease Area 2 – Streamline Container Services Tenancy
Proposal:	Change of Use to a Freight Transport Facility. The development is identified as Designated Development in accordance with Clause 2.7 of the State Environmental Planning Policy (Resilience and Hazards) 2021.
Date of receipt:	18 November 2021
Applicant:	STREAMLINE CONTAINER SERVICES
Owner:	Camellia Grande Pty Ltd
Property owned by a Council employee or Councillor:	The site is not known to be owned by a Council employee or Councillor
Political donations/gifts disclosed:	None disclosed on the application form
Submissions received:	Five (5) unique submissions
Recommendation:	Refusal
Assessment Officer:	John Martinez

2. Legislative Requirements

Relevant provisions considered under section 4.15(1)(a) of the Environmental Planning and Assessment Act 1979	<ul style="list-style-type: none"> • State Environmental Planning Policy (Resilience and Hazards) 2021 • State Environmental Planning Policy (Biodiversity and Conservation) 2021 • State Environmental Planning Policy (Transport and Infrastructure) 2021 • Parramatta Local Environmental Plan 2011 (LEP 2011) • Parramatta Development Control Plan 2011 (DCP 2011) • Draft Parramatta Local Environmental Plan 2020 (DLEP 2020)
Zoning	IN3 Heavy Industrial
Bushfire Prone Land	No
Heritage	Not listed however adjoins <i>I1 Wetlands & I6 Tram alignment</i>
Heritage Conservation Area	No
Designated Development	Yes, under SEPP (Resilience and Hazards) 2021.
Integrated Development	No
Clause 4.6 variation	No
Delegation	Parramatta Local Planning Panel (PLPP) – Designated Development

3. Site Description and Conditions

The subject property is known as **37A Grand Avenue, Camellia (Lot 2 DP 539890)**. The property is an industrial allotment with an approximate site area of 32,800m² and adjoins the Parramatta River to the rear. The property has four (4) vehicular access points to Grand Avenue and has been divided into six (6) areas that are all leased separately. The

subject development application relates to Lease Area 2 (The Site) of the property and is currently leased to Streamline Container Services.

There are two leasable areas within the subject property being used as freight transport facilities (Lease Area 2 and Area 4). A skip bin depot use (Lease Area 1) is operating with development consent. Lease Area 5 has been issued development consent for the use as a heavy industry – concrete batching facility by the NSW Land and Environment Court on 28 January 2022, subject to conditions.

Streamline Container Services (Lease Area 2) is currently operating on site without development consent. To date, Council has received numerous complaints and submissions with regards to the use generating acoustic and air quality impacts onto the residential properties to the north of Parramatta River. As a result, Council's Compliance Officers have instructed Streamline Container Services to seek retrospective approval for the use in order to continue with the operations on site. This is in line with Council's Regulatory Enforcement Policy (Policy No. 306, dated 10/07/2017) in which "...a staged approach to obtain compliance will be applied to matters other than parking offences. That is, in the first instance, offenders will be given the opportunity to remedy the breach before enforcement action is taken."



Figure 1: Subject property indicatively outlined in red, subject lease area outlined in yellow (Nearmap, 21 December 2021)



Figure 2: Aerial image of vacant subject site depicting stormwater pipes and pits (Nearmap, 18 January 2018)

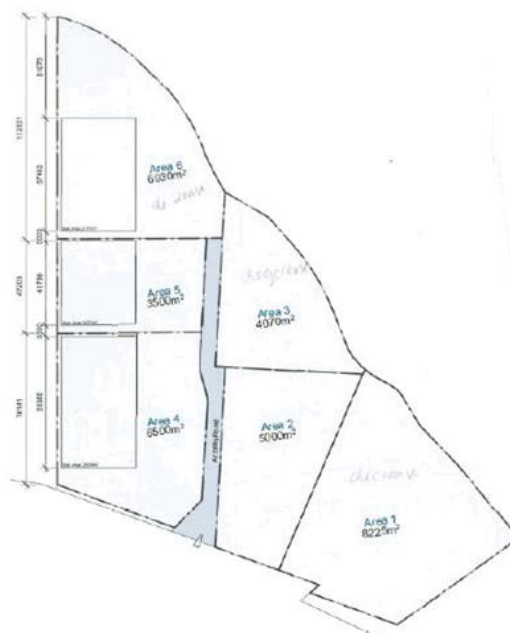


Figure 3: Subject property's lease areas (Statement of Environmental Effects DA/1046/2021, Urban Planning & Building Consultants)

The subject property and its surrounding properties along the southern side of Parramatta River are zoned as IN3 Heavy Industry. Properties within vicinity to the north of the subject property are zoned as W2 Recreational Waterways, RE1 Public Recreation, R2 Low Density Residential and IN1 General Industrial.

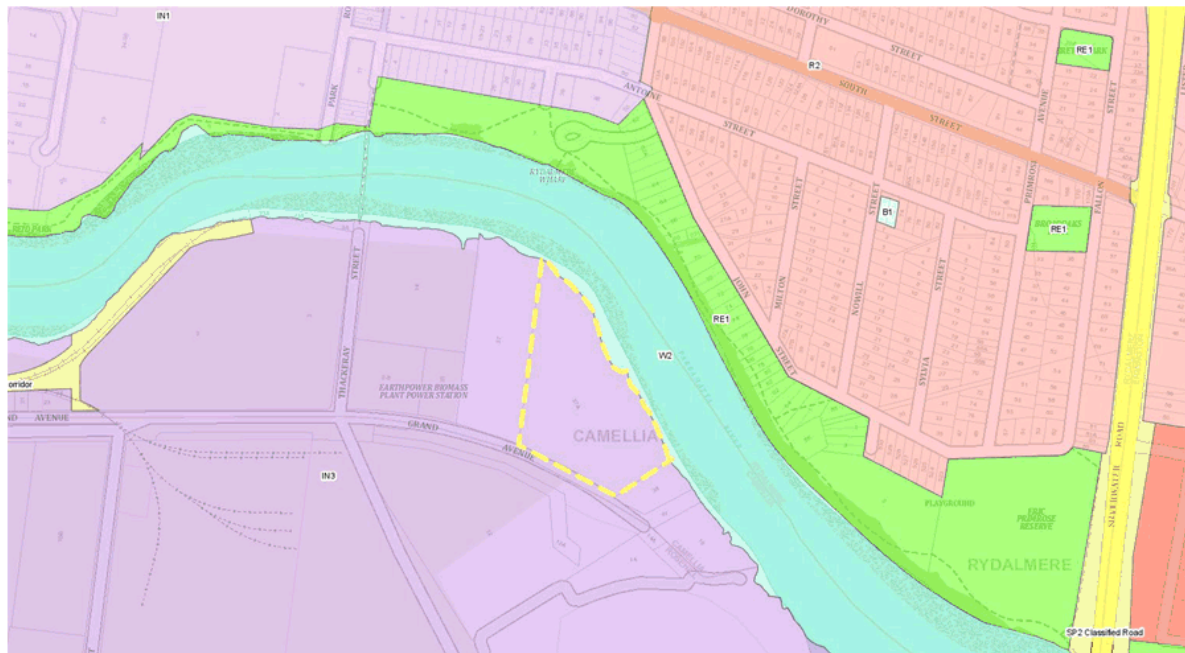


Figure 4: LEP 2011 Zoning Map (ePlanning Spatial Viewer)

A site inspection was conducted on 15 December 2021, and it was identified that the construction of a concrete slab and associated earthworks were undertaken without development consent. It is noted that these earthworks have resulted in fill being placed on top of the property's drainage pipe system. In addition, the site is known to be contaminated with high concentrations of hexavalent chromium and it is evident that the site capping has been damaged due to exposed soil being identified.



Figure 5: Unauthorised slab (top) and fill along northern side of Lease Area 2 facing west (Site inspection, 15 December 2021)



Figure 6: Subject site facing south towards Grand Avenue (Site inspection 15 December 2021)

4. Relevant Site History

Date	Comment
20 December 2013	Development Application DA/433/2013 for <i>Remediation of land and demolition works. The application is defined as a 'Nominated Integrated Development' as approval is required under the Water Management Act 2000</i> approved by Council.
8 March 2018	Development Application DA/986/2017 for <i>Use of the site as a temporary Bus Depot</i> approved by Council.
19 February 2018	Complying Development Certificate CDC-18017 for <i>Partial use of existing hardstand area for parking of trucks and storage of bins with associated carparking spaces at the subject address</i> issued by Blackett Maguire + Goldsmith Certifiers.
19 December 2018	Development Application DA/590/2018 for <i>Change of use to truck depot including storage of recycling skip bins and shipping containers and installation of a diesel fuel tank. The proposed development is identified as Integrated Development for the purposes of the Water Management Act 2000</i> approved by Council. This use was approved with Monday to Friday 24/7 hours of operations.
15 November 2021	Development Application DA/1046/2021 for <i>Continued use of the subject site for the purposes of a freight transport facility and for short-term storage of shipping containers</i> lodged to Council. This application is in relation to Lease Area 4 of the subject property.
16 November 2021	Development Application DA/749/2021 for <i>Installation of a temporary concrete batching facility. The development is Designated Development as defined by Schedule 3 of the Environmental Planning and Assessment Regulation 2000</i> refused by the Parramatta Local Planning Panel (PLPP). An appeal was made to the refusal of this application and development consent was granted by the NSW Land and Environment Court on 28 January 2022.
18 November 2021	Subject Development Application lodged with Council.
15 December 2021	Council issued a letter to the Applicant requesting the application to be withdrawn.

5. Relevant Application History

Date	Comment
18 November 2021	Subject Development Application lodged to Council.
15 December 2021	Council issued a letter to the Applicant requesting the application to be withdrawn. Withdrawal of the application was requested as Council and NSW EPA does not have sufficient evidence to demonstrate that the actions required under the Voluntary Management Plan (VMP) and the completion of the Remediation Action Plan (RAP). The applicant was advised that Council does not have documentation demonstrating that the subject property's capped surface meets the required specifications or to validate that the remedial goals have been met and whether contingency actions are required.
17 January 2021	Council accepted the Applicant's request to address the outstanding contamination issues on the property and advised the Applicant of the unauthorised slab and earthworks identified on site.
2 February 2022	Applicant provided additional information comprising Remediation & Validation Reports, DA Assessment reports, Construction Certificates & Occupation Certificates, Development Consents. Council's Environmental Health Officer has advised that insufficient information was submitted to demonstrate that the subject property has been adequately remediated.

SECTION 4.15 EVALUATION

6. The Proposal

The proposal consists of the following:

- **Retrospective approval for the use of the site as a freight transport facility**

Matters Considered	Proposal
Hours of Operation	24 hours a day, 7 days a week
Staff Proposed	13 staff
Parking Spaces	11 spaces for light vehicles and 8 spaces for forklift, truck and trailers
Location of Use	Lease Area 2 of the subject property
Access	There is an existing driveway access from Grand Avenue into Lease Area 2
Truck Movements	Approximately 70 heavy vehicles and 70 light vehicles per day
Use Activities	<ul style="list-style-type: none"> • Manoeuvring containers around the site, loading and unloading of containers on trucks • Storing and maintaining prime movers, semi-trailers and forklifts
Waste Management	On-going waste generated on site will be serviced by a private waste collection service

7. Land Zoning

7.1 Permissibility

The subject property is zoned as IN3 Heavy Industrial under the Parramatta Local Environmental Plan 2011 (PLEP 2011). Council has assessed the proposed land use in its current form to be classified as *freight transport facility* which is permissible under IN3 zoning.

The use is defined by PLEP 2011 as the following:

freight transport facility means a facility used principally for the bulk handling of goods for transport by road, rail, air or sea, including any facility for the loading and unloading of vehicles, aircraft, vessels or containers used to transport those goods and for the parking, holding, servicing or repair of those vehicles, aircraft or vessels or for the engines or carriages involved.

The proposed operations consist of the loading, unloading and storage of shipping containers on site and is consistent with the permissible defined use.

7.2 Objectives

The objectives of IN3 Heavy Industrial are the following:

- To provide suitable areas for those industries that need to be separated from other land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of heavy industry on other land uses.
- To support and protect industrial land for industrial uses.
- To allow a wide range of industrial and heavy industrial uses serving the Greater Metropolitan Area of Sydney and beyond.
- To ensure that opportunities are not lost for realising potential foreshore access on land that is contaminated and currently not suitable for public access.

The subject application in its current form is not consistent with the third and sixth objectives of the zone.

The site is within close vicinity (approx. 200m) to residential properties at the northern side of Parramatta River. On-going complaints and submissions have been received from these properties regarding the amenity impacts being generated from the site. The proposed development in its current form is therefore inconsistent with the third objective of the IN3 Heavy Industrial Zone. There is insufficient information to demonstrate that the development will not create acoustic and dust impacts onto the residential properties.

The site has a publicly accessible foreshore and is a contaminated site with the possibility of exposures to contamination as a result of water seepage along this foreshore. Insufficient information has been submitted to confirm validated remediation works on this site have been undertaken, and therefore to demonstrate the suitability of public access along the foreshore. The proposed development in its current form is therefore inconsistent with the sixth objective of the IN3 Heavy Industrial Zone.

8. Water Management Act 2000

The site is located within 40 metres of a natural watercourse however advice was provided by the NSW National Resource and Access Regulator (NRAR) stating that *the proposed works are of insufficient size and scale and/or do not involve carrying out a work, removing or depositing material on waterfront land, or carrying out an activity which affects the quantity or flow of water in a water source.*

As such the development in its current form is also not considered to be integrated development and therefore the provisions within Section 4.47 of the Environmental Planning and Assessment Act 1979 do not apply. The development may be classified as integrated development should the Applicant be required to undertake remediation works to Lease Area 2.

9. Environmental Planning Instruments

9.1 STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021 – CHAPTER 4 REMEDIATION OF LAND

The site is currently declared as a remediation site under the Contaminated Lands Management Act 1997 (Declaration 21116).

The submitted Environmental Impact Statement (EIS) states that the site has been contaminated from historic industrial activity in the area involving manufacture of chromium chemicals between the 1940s and 1970s.

The Environmental Protection Authority (EPA) has declared the site as contaminated due to high concentrations of hexavalent chromium found in groundwater and stormwater with potential contaminated surface water flows from the northern border of the site into Parramatta River. The declaration also identifies the possibility of human and environmental exposures to the contamination due to contaminated water seepage along the publicly accessible foreshore.

A Voluntary Management Plan and Remediation Action Plan was prepared in June 2014 by Consara Pty Ltd and was submitted to the EPA. The objective of the Remediation Action Plan was to control the mobilisation of chromium contained in fill material to ground water by installing impermeable pavement to prevent the infiltration of water to the underlying contaminated material and groundwater recharge.

Comments received by Council from the EPA states that insufficient evidence has been received to demonstrate that the actions required under the Voluntary Management Plan have been carried out and completion of the Remediation Action Plan. No documentation has been received to confirm that the capped surface currently on the site meets the required specifications or to validate that the remedial goals have been met, and whether contingency actions are required. An accredited Site Audit Statement and Site Audit Report has not been submitted to the EPA and has not been submitted with this Development Application.

9.1.1 Assessment

An assessment of the application has been undertaken on the basis of Clause 4.6(1), 4.6(2) and 4.6(3) of Chapter 4 of the SEPP and the *Managing Land Contamination Planning Guidelines 1998* for assessing potential contamination of a site. The following is a checklist for the evaluation:

Is the planning authority aware of any previous investigations about contamination on the land? What were the results including any previous evaluations?

Comment: Yes, there are records of contamination on the site and the site is currently declared as a remediation site.

Do existing records of the planning authority show that an activity listed in Table 1 has ever been approved on the subject land? (The use of records held by other authorities or libraries are not required for an initial evaluation).

Acid/alkali, plant and formulation	Landfill sites
Agricultural/horticultural activities	Metal treatment
Airports	Mining and extractive industries
Asbestos production and disposal	Oil production and storage
Chemicals manufacture and formulation	Paint formulation and manufacture
Defence works	Pesticide manufacture and formulation
Drum re-conditioning works	Power stations
Dry cleaning establishments	Railway yards
Electrical manufacturing (transformers)	Service stations
Electroplating and heat treatment premises	Sheep and cattle dips
Engine works	Smelting and refining
Explosives industry	Tanning and associated trades
Gas works	Waste storage and treatment
Iron and steel works	Wood preservation

Table 1: Some Activities that may cause contamination

Comment: The site is associated with historic use for the manufacture of chromium-based chemicals.

Was the subject land at any time zoned for industrial, agricultural or defence purposes?

Comment: The current zoning for the site is zoned IN3 Heavy Industrial under Parramatta Local Environmental Plan 2011.

Is the subject land currently used for an activity listed in Table 1 above?

Comment: Council records and inspections reveal that the land is not currently used for a purpose identified at Table 1 above.

To the planning authority's knowledge was, or is, the subject land regulated through licensing or other mechanisms in relation any activity listed in Table 1?

Comment: It is known that the site was historically used for chromium-based chemical manufacturing.

Are there any land use restrictions on the subject land relating to possible contamination such as notices issued by the EPA or other regulatory authority?

Comment: Yes, the EPA has declared the subject site a remediation site under the Contaminated Lands Management Act 1997.

Does a site inspection conducted by the planning authority suggest that the site may have been associated with any activities listed in Table 1?

Comment: No current uses on the site are activities listed in Table 1 however it is known that the site has been historically used for chromium-based chemical manufacturing.

Is the planning authority aware of information concerning contamination impacts on land immediately adjacent to the subject land which would affect the subject land?

Comment: The site and adjacent sites are identified as contaminated.

Has the applicant for development consent carried out the investigation required by subclause 7(2) of SEPP 55 and provided a report on it to the consent authority.

Comment: The applicant has submitted a Remediation Action Plan as part of the Development Application. A Voluntary Management Plan was not submitted. It is noted that the Remediation Action Plan is dated from 2014 and no evidence has been submitted to demonstrate that the actions in this plan have been adequately satisfied. The submitted Remediation Action Plan does not adequately address the contamination present on the site relative to the proposed development. Council's Environmental Health Officer has reviewed the documentation, is not satisfied with the level of documentation submitted with the application and has requested the following documents:

- Voluntary Management Plan.
- Validation of remediation works completed.
- A Phase 2 Detailed Site Investigation Report.
- Site Audit Statement to review the Phase 2 Detailed Site Investigation to be prepared by an independent NSW EPA accredited auditor for contaminated land.

This information has not been submitted by the applicant.

Based on the above, insufficient information has been submitted to Council to demonstrate that the site is suitable for the proposed use and Clause 4.6 of the SEPP remains unsatisfied. As such, the application is recommended for refusal.

9.2. STATE ENVIRONMENTAL PLANNING POLICY (BIODIVERSITY AND CONSERVATION) 2021 – CHAPTER 10 SYDNEY HARBOUR CATCHMENT

The site is located on the foreshore and is adjacent to a waterway and therefore the objectives of the Chapter 10 of the SEPP are applicable to the proposed development.

The development is consistent with the objectives and controls contained within the SEPP.

9.3 STATE ENVIRONMENTAL PLANNING POLICY (TRANSPORT AND INFRASTRUCTURE) 2021 – CHAPTER 2 INFRASTRUCTURE

The relevant matters to be considered under Chapter 2 of the SEPP for the proposed development are outlined below.

Clause	Compliance
Pipelines and pipeline corridors	
Determination of development applications (Previously Cl. 66C of ISEPP 2007)	No objections, subject to conditions – The subject site is located within vicinity to Ampol's petrol pipeline. The application was referred to Ampol subject to a 'Dial before you dig' condition to be imposed. The development proposal in its current form is only seeking consent for the use only with no physical works, and therefore the imposition of this condition is not required in this instance.
Roads and traffic	
Traffic-generating development (Previously Cl. 104 of ISEPP 2007)	No objections, advisory comments provided – The development proposal is considered to be a traffic generating development. The application was referred to RMS and no objections were raised. Advisory comments were provided regarding the requirement for a Construction Traffic and Management Plan (CTMP), and the Parramatta Light Rail Stage 2 with its draft alternative route alignment through the subject property. As Stage 2 is only at design stage, the route alignments are neither imminent nor certain and therefore does not affect the assessment of the development application.

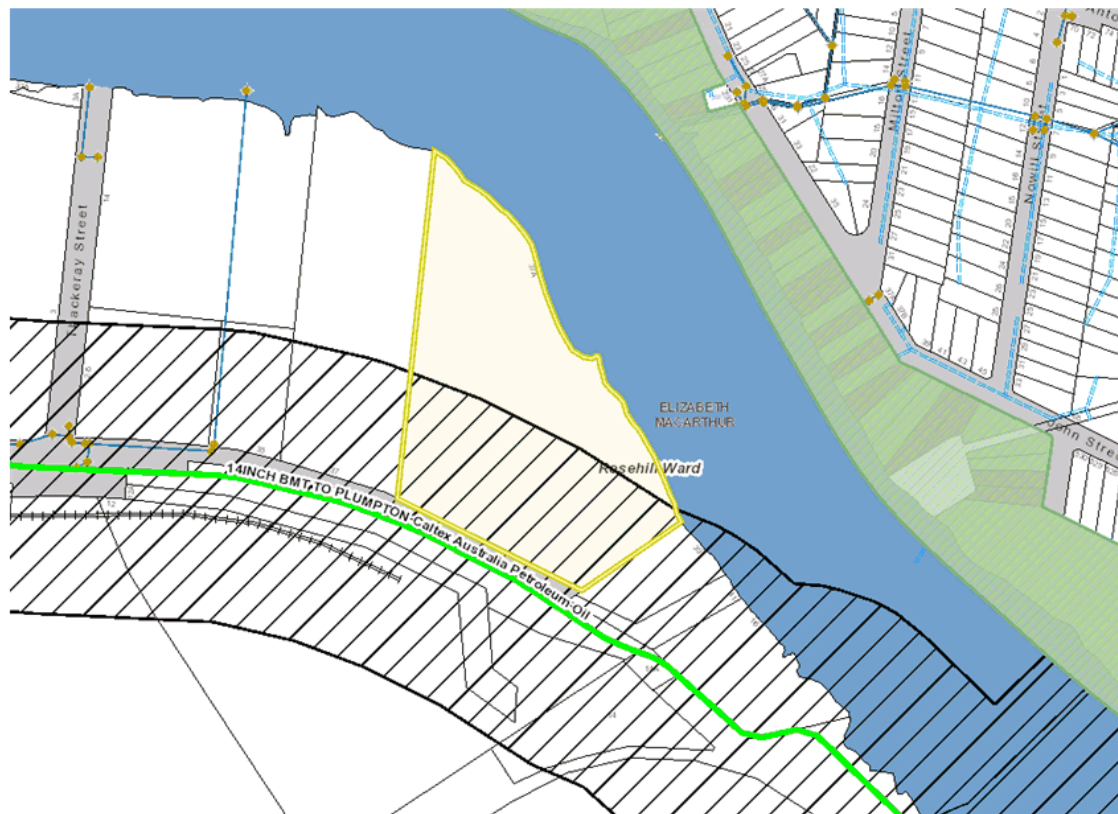


Figure 7: Indicative alignment of the Caltex/Ampol pipeline (GISOnline City of Parramatta)

9.4 STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021 – CHAPTER 2 COASTAL MANAGEMENT

The subject property is identified as a coastal environment area, coastal use area, proximity area for coastal wetlands and adjoins coastal wetlands. Therefore, Clauses 2.7, 2.8, & 2.10 of Chapter 2 of the SEPP applies to the development proposal.

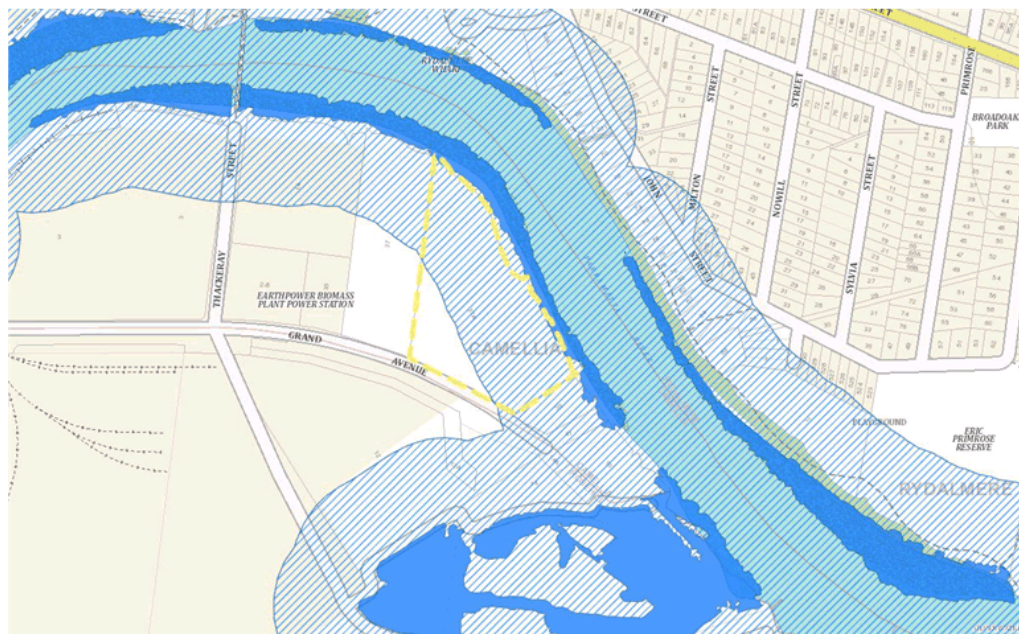


Figure 8: Coastal wetlands SEPP Coastal Management Map 2018 (ePlanning Spatial Viewer)

9.4.1 Designated Development

Clause 2.7(2) of the SEPP states that for the purpose of any development within the area mapped as 'coastal wetlands' is declared to be designated development for the purposes of the Act. The site being Lease Area 2 has a small portion of the north-eastern corner being mapped as 'coastal wetlands'.

The Applicant obtained a Secretary's Environmental Assessment Requirements (SEAR No. 1605) issued by NSW DPIE and subsequently an Environmental Impact Statement was prepared in accordance with Clauses 190, 191 and 192 of the Environmental Planning and Assessment Regulation 2021. It is noted that the SEAR indicated the proposal to be integrated development due to its vicinity to the watercourse however, the NSW Natural Resource Access Regulators (NRAR) has advised that the proposal is not considered to be integrated development.

9.4.2 Assessment Considerations

Clause 2.7(4) of Chapter 2 Coastal Management of the SEPP states the following:

(4) A consent authority must not grant consent for development referred to in subclause (1) unless the consent authority is satisfied that sufficient measures have been, or will be, taken to protect, and where possible enhance, the biophysical, hydrological and ecological integrity of the coastal wetland or littoral rainforest.

Clause 2.8 of Chapter 2 Coastal Management of the SEPP states the following:

(1) Development consent must not be granted to development on land identified as "proximity area for coastal wetlands" or "proximity area for littoral rainforest" on the Coastal Wetlands and Littoral Rainforests Area Map unless the consent authority is satisfied that the proposed development will not significantly impact on—

- (a) the biophysical, hydrological or ecological integrity of the adjacent coastal wetland or littoral rainforest, or*
- (b) the quantity and quality of surface and ground water flows to and from the adjacent coastal wetland or littoral rainforest.*

(2) This clause does not apply to land that is identified as "coastal wetlands" or "littoral rainforest" on the Coastal Wetlands and Littoral Rainforests Area Map.

Clause 2.10 of Chapter 2 Coastal Management of the SEPP states the following:

(1) Development consent must not be granted to development on land that is within the coastal environment area unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the following—

- (a) the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,*
- (b) coastal environmental values and natural coastal processes,*
- (c) the water quality of the marine estate (within the meaning of the Marine Estate Management Act 2014), in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,*
- (d) marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,*
- (e) existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,*
- (f) Aboriginal cultural heritage, practices and places,*
- (g) the use of the surf zone.*

(2) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that—

- (a) the development is designed, sited and will be managed to avoid an adverse impact referred to in subclause (1), or*
- (b) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or*
- (c) if that impact cannot be minimised—the development will be managed to mitigate that impact.*

Insufficient information has been submitted with regard to the structural adequacy of the capping currently on the site to demonstrate that it can withstand the loading of vehicular movements and infrastructure required for the development and that it is sufficiently impermeable to prevent groundwater recharge through infiltration. In addition, insufficient information has been submitted demonstrating that the unauthorised slab and earthworks have not damaged the existing capping.

Council is not satisfied that the proposed development will not significantly impact on the biophysical, hydrological or ecological integrity of the adjacent coastal wetland. Council is also not satisfied that the development is sited and has been designed to minimise impacts upon the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment; any marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms; existing public open space and safe access to and along the foreshore; and Aboriginal cultural heritage, practices and places.

Therefore, it is considered that insufficient information has been submitted to demonstrate that the proposed development satisfies the objectives of Chapter 2 of the SEPP.

9.5 PREVIOUS STATE ENVIRONMENTAL PLANNING POLICIES

The subject application was lodged prior to the commencement of the Consolidated State Environmental Planning Policies on 1 March 2022. As the provisions within the previous SEPPs are generally the same, savings provisions do not apply to the new SEPPs. A comparison of the previous and consolidated SEPPs are demonstrated in the table below.

Old SEPP/SREP	New SEPP	New Location
(Sydney Harbour Catchment) 2005	(Biodiversity and Conservation) 2021	• Chapter 10
(Coastal Management) 2018	(Resilience and Hazards) 2021	• Chapter 2
No 55—Remediation of Land	(Resilience and Hazards) 2021	• Clause 7 = cl4.6 • Clause 17 & 18 = cl4.16 & cl4.17
(Infrastructure) 2007	(Transport and Infrastructure) 2021	• Chapter 2

10. Parramatta Local Environmental Plan 2011

Standards and Provisions	Compliance
Part 4 Principal development standards	
Cl. 4.3 Height of buildings	Complies Maximum = 9m & 12m The three (3) existing demountable buildings on site are approximately below 4m.
Cl. 4.4 Floor space ratio	Complies Maximum = 1:1 (GFA 32,800m ²) The three (3) existing demountable buildings have an approximate GFA of 70.85m ² . Given the total site area, the proposal does not add any Gross Floor Area to the site that would render the total FSR non-compliant with the development standard.
Part 5 Miscellaneous provisions	
Cl. 5.1A Development on land intended to be acquired for public purposes	The proposal is not identified on the map.
Cl. 5.4 Controls relating to miscellaneous permissible uses	These provisions do not apply to the development proposal.
Cl. 5.6 Architectural roof features	An architectural roof feature is not proposed.
Cl. 5.7 Development below mean high water mark	The proposal is not for the development of land that is covered by tidal waters.
Cl. 5.10 Heritage conservation	Insufficient information The subject property adjoins <i>I1 Wetlands</i> at Parramatta River & <i>I6 Tram alignment</i> at Grand Avenue. The proposed use within the subject site is not considered to have significant adverse impacts to <i>I6 Tram alignment</i> . The proposed use is unlikely to directly adversely impact <i>I1 Wetlands</i> , however indirectly, given the unresolved earthworks and contamination issues, insufficient information has been submitted to demonstrate that the existing capping on site is sufficient to contain the contaminated material and will not cause adverse impact to the Parramatta River and its mangroves.
Cl. 5.21 Flood planning	Insufficient information Part of the property is subject to 20 year ARI and 100 year ARI flood however, the property as a whole is subject to Probable Maximum Flood (PMF). Council's Catchment and Development Engineer has reviewed the proposal and has requested additional information be submitted with further consideration to stormwater run-off and shelter in place requirements.

Part 6 Additional local provisions	
Cl. 6.1 Acid sulfate soils	The site contains Class 3 Acid Sulfate Soil. An Acid Sulfate Soils Management Plan is not required to be prepared in this instance as earthworks are not proposed. However, it may be required at a later stage should further remediation works be required.
Cl. 6.2 Earthworks	<p>Insufficient information</p> <p>Whilst earthworks are not proposed in this instance, it is noted that based on historical aerial images (Feb. 2020 to May 2021) and site inspection, unauthorised earthworks were undertaken throughout the site and that the ground bitumen layer has been damaged. In addition, it is noted that these earthworks resulted in fill being placed on top of the site's drainage system.</p> <p>In this regard, insufficient information has been submitted to demonstrate that the earthworks undertaken comply with the matters within Clause 6.2(3) of LEP 2011. There are concerns that the earthworks undertaken may likely create detrimental effects on the Parramatta River and existing drainage patterns of the locality. The unauthorised earthworks should be considered concurrently with the unresolved contamination issues of the property.</p>
Cl. 6.4 Biodiversity protection	The site is not identified on this map.
Cl. 6.5 Water protection	<p>Insufficient information</p> <p>Part of the site is identified as riparian land. The use/operations are predominantly outside of this area and this area is only being used as parking spaces for any unused trailers. Any potential run off from trailers and trucks such as oils may be addressed by conditions should this application be approved.</p> <p>The proposed use is unlikely to adversely impact on the adjoining waterways, banks and shores of waterways and ground water systems, however given the unresolved earthworks and contamination issues, insufficient information has been submitted to demonstrate the existing capping on site is sufficient to contain the contaminated material from seeping into the riparian land.</p>
Cl. 6.6 Development on landslide risk land	The site is not identified on this map.
Cl. 6.7 Affected by a Foreshore Building Line	<p>Insufficient Information</p> <p>Part of the site is identified as foreshore building line. The use/operations are predominantly outside of this area and this area is only being used as parking spaces for any unused trailers.</p> <p>The proposed use is unlikely to adversely impact the foreshore building line, however given the unresolved earthworks and contamination issues, insufficient information has been submitted to demonstrate the existing capping on site is sufficient to contain the contaminated material and will not cause adverse impact to the surrounding foreshore area.</p>

11. Parramatta Development Control Plan 2011

The Draft Parramatta Local Environmental Plan 2020 was placed on public exhibition from 31 August 2020 to 12 October 2020. The draft LEP will replace the five existing LEPs that apply within the Local Government Area and will be the primary legal planning document for guiding development and land use decisions made by Council.

Whilst the draft LEP must be considered when assessing this application under Clause 4.15 (1) (a) (ii) of the Environmental Planning & Assessment Act 1979, the LEP is neither imminent nor certain and therefore limited weight has been placed on it.

A brief comparison of the existing and proposed instruments is demonstrated below.

	Parramatta LEP 2011	Draft Parramatta LEP 2020
Land Zoning	IN3 Heavy Industrial	IN3 Heavy Industrial
Maximum Height	9m & 12m	9m & 12m
Maximum Floor Space Ratio	1:1	1:1

There are no changes proposed under the draft LEP that amend key development standards applicable to the site. As such, the proposal is inconsistent with the provisions of this draft LEP in the same manner as the current LEP 2011.

12. Parramatta Development Control Plan 2011

The relevant matters to be considered under the Parramatta Development Plan 2011 (DCP 2011) for the proposed development are outlined below.

Control	Proposal	Complies
Part 2 – Site Planning		
2.4.1 Views and vistas	There are no significant views and vistas from the subject site identified in Appendix 2 of Council's DCP.	N/A
2.4.2 Water Management	<p>The site is identified as being flood prone. A flood report and flood emergency evacuation plan has not been submitted for assessment.</p> <p>Part of the site is identified as riparian land. The location of the proposed use is predominantly outside of this area. The proposed use is unlikely to adversely impact on the adjoining waterways, banks and shores of waterways and ground water systems, however given the unresolved earthworks and contamination issues, insufficient information has been submitted to demonstrate the existing capping on site is sufficient to contain the contaminated material from seeping into the riparian land.</p>	Insufficient Information
2.4.3 Soil Management	<p>The site consists of unauthorised earthworks, and it was identified that there are exposed soils throughout the site. Insufficient information has been submitted on how this could be addressed notwithstanding the contamination issues on site.</p> <p>It was identified in the site inspection that dust was being generated a result of the operations on site and exposed. A dust management plan was not submitted for assessment. There are concerns that the dust being generated on site is from the exposed soils that may be contaminated.</p>	Insufficient Information
2.4.5 Air Quality	An Air Quality Impact Assessment report was submitted in accordance with the SEARs. The assessment states that the use does not cause any additional exceedances of the air quality at nearby residential locations.	Yes
2.4.6 Development on sloping land	The site is fairly flat, and no earthworks are proposed in this application.	N/A
2.4.7 Biodiversity	The development in its current form is not considered to impact the heritage listed mangroves along the Parramatta River.	N/A
2.4.8 Public Domain	No works are required onto the public domain.	N/A
Part 3 – Development Principles		
3.1 Preliminary Building Envelope	The three (3) existing demountable buildings within the site have appropriate setbacks.	Yes
3.3 Environmental Amenity		
3.3.1 Landscaping	No changes are proposed to the existing hardstand surfaces on site.	N/A
3.3.3 Visual and Acoustic Privacy	The submitted acoustic assessments based on the existing operations of the site are insufficient. Refer to Section 13 for further discussion.	Insufficient Information
3.3.5 Solar Access and Cross Ventilation	The proposal does not result in adverse solar access and cross ventilation impacts onto the residential properties to the north of Parramatta River.	Yes
3.3.6 Water Sensitive Urban Design	Council's Development Engineer has reviewed the application and raises concerns with the site's existing stormwater system. Refer to Section 13 for further discussion.	Insufficient Information
3.3.7 Waste Management	Council's Environmental Health Officer has reviewed the waste management plan and considers it to be insufficient. Refer to Section 13 of this assessment report for further discussion.	Insufficient Information
3.4 Social Amenity		
3.4.4 Safety and Security	The proposal is acceptable and has sufficient passive surveillance of the public domain.	Yes
3.5 Heritage	Refer to Clause 5.10 of LEP 2011 discussion in Section 10 of this assessment report.	Insufficient Information
3.6 Movement and Circulation	Council's Traffic and Transport Engineer has assessed the car parking rates for the proposed use against the RMS Guide to Traffic Generating Developments. Whilst there is a shortfall of 2 light vehicle parking spaces, this can be conditioned to comply. Refer to Section 13 of this assessment report for further discussion.	Yes, subject to conditions.

	DCP 2011 requires the development to provide 11 bicycle spaces however, Council's Traffic and Transport Engineer considers this excessive, and a condition could be imposed for the use to provide 2 bicycle spaces instead.	
Part 4 – Special Precincts		
4.3.1 Camellia and Rydalmere Strategic Precinct	The site is located within the Camellia and Rydalmere Strategic Precinct. The proposed use being an industrial use is considered consistent with the objectives of this section of the DCP.	Yes

13. Referrals

The application has been referred to Council's relevant internal teams and relevant external agencies for assessment. The referral responses have been summarised and discussed in the table below.

Internal		Comment
Development Engineer		<p>Not supported, insufficient information,</p> <p>The proposed use is for the loading, unloading and storage of shipping containers on part of the site. The use appears to be suitably low impact and therefore considered appropriate if adequate safeguards are in place, particularly with regard to the severe flood risk and to the management of contamination. The surface management, soil and erosion control, underground and surface damage, potential leachate, water quality need to be better defined and formalise.</p> <p><i>Stormwater Management</i></p> <p>A new stormwater and water management plan and report is to be provided due to the uncertainty of the existing stormwater system on site. In addition, plans and information relating to water quality treatment, Water Sensitive Urban Design (WSUD) in accordance with DCP 2011, MUSIC modelling and compliance to other applicable standards are to be provided for assessment.</p> <p><i>Flooding</i></p> <p>A stormwater plan with provision for a shelter in place flood refuge facility with a floor level of RL 6m AHD or higher (PMF level) where occupants can remain until the flood event has passed and any subsequent disruption after the flood has been rendered safe and serviceable is to be provided.</p> <p>A Flood Emergency Response plan prepared by a suitably qualified flood risk consultant is to be provided to guide all future operators and occupants of the facility to be flood risks and provisions for shelter in place.</p> <p><u>Planner's Comment:</u> Upon site inspection, there are concerns that the unauthorised earthworks may be impacting the existing stormwater system and flood flows of the site.</p>
Environmental Health – Acoustic		<p>Not supported, insufficient information.</p> <p>The site is subject to ongoing investigations and potential legal action with regards to the ongoing complaints received about the operation of the site.</p> <p>The acoustic assessments dated 22 January 2021 and 22 July 2021 have been reviewed. The assessments only address the operation procedures as a method to control potential negative noise impacts. Since the provision of these assessments, Council has received ongoing complaints about the noise being generated from the site. The operation controls suggested in the Applicant's acoustic assessments do not appear to be effective in controlling acoustic impacts to the residential properties.</p> <p>It is noted that in the acoustic assessments that there were multiple instances of the maximum noise level occurrences being well above 80dB during the monitoring period. This is considered to negatively impact the surrounding sensitive receivers.</p>
Environmental Health – Contamination		<p>Not supported, insufficient information.</p> <p>The site is still actively declared as remediation site under the Contaminated Land Management Act 1997. The NSW EPA has advised the following:</p> <p><i>Regulation of the Remediation of the Significantly Contaminated Land</i></p> <p><i>The NSW Environment Protection Authority (EPA) issued a Notice of Approval of Voluntary Management Proposal to Camellia Linx Pty Ltd on 17 January 2018 to implement a Voluntary Management Proposal (VMP) for the site. The VMP requires Camellia Linx Pty Ltd to undertake remedial actions to address the contamination of the site. The following remedial actions required by the VMP have not been completed:</i></p> <p><i>- Monitoring of the groundwater and visual inspection for seeps;</i></p>

	<p>- Implementation of the Remedial Action Plan (and contingency actions if required);</p> <p>- Preparation of a validation report on the remediation works undertaken with conclusions as to whether the risks have been addressed, including recommendations for further work; and</p> <p>- Completion of a site audit statement (section B) to confirm that the risks to human health and the environment have been mitigated and that the requirements for ongoing management are appropriate.</p> <p>Council's Environmental Health team requested the following information to be submitted:</p> <ul style="list-style-type: none"> • Voluntary Management Plan, • Validation of remedial works completed, • A Phase 2 detailed site investigation report, • Site Audit Statement to review the Phase 2 detailed investigation to be prepared by an independent NSW EPA accredited auditor for contaminated land. <p><u>Planner's Comment:</u> Council issued a letter to the Applicant requesting the application to be withdrawn as the above information was not submitted due to the site's outstanding contamination issues. The Applicant responded with the submission of various reports however, Council's Environmental Health team was not satisfied of the information submitted.</p>
Environmental Health – Waste	<p>Not supported, insufficient information.</p> <p>Insufficient details have been provided with the application with regards to waste management for the ongoing use of the site. Additionally, it is noted the contamination status of the site has not been supported. Additional waste information would need to be provided in conjunction with the demolition and construction as part of any remediation works that take place on site. Council would need to review these before any approval is given.</p>
Heritage	<p>No objections, advisory comments provided.</p> <p>The proposed activities should be reasonably separated from the biodiversity of the wetlands along the Parramatta River which are of significance of the Parramatta area. These are remnant representative areas of mangroves and salt marshes which one extensively lined the foreshores and tidal water flats of the region.</p> <p><u>Planner's Comment:</u> The mangroves along Parramatta River are heritage listed under LEP 2011. The application does not propose any works however, the outstanding unauthorised earthworks and contamination issues may be impacting Parramatta River.</p>
Open Space and Natural Resources	<p>No objections, subject to conditions.</p> <p>An Environmental Impact Statement (EIS) and an Ecological Impact Assessment (EIA) have been provided in line with the SEARs issued by NSW DPIE. These documents have been reviewed and concur with the ecological report that this Development Application (DA) is unlikely to significantly impact threatened entities given there is essentially no native vegetation on site and the subject site almost entirely comprises of hardstand surfaces. It is also agreed that the DA does not trigger the Biodiversity Offsets Scheme (BOS), noting that the SEARs did not request a Biodiversity Development Assessment Report (BDAR).</p> <p>With consideration of the above, the proposed development will not be likely to significantly impact threatened species, ecological communities or their habitats and no ecological constraints apply that warrant further investigation.</p> <p><u>Planner's Comment:</u> The application does not propose any works however, the outstanding earthworks and contamination issues may be impacting Parramatta River.</p>
Traffic and Transport	<p>No objections, subject to conditions.</p> <p>The application was assessed against the RMS Guide to Traffic Generating Developments.</p> <p>The traffic report states that information provided by the Client indicate that the light vehicle parking requirements, in accordance with their operational needs, are 13 spaces to satisfy peak demand of the site.</p> <p>The proposed development will result in 2 light vehicle parking spaces shortfall. There appears to be sufficient space on site to provide 2 additional light vehicle parking spaces to meet peak demand operational needs as indicated above. As such, a condition is recommended that the proposed development provide 13 light vehicle parking spaces on site.</p>
External	Comments
Ampol/Caltex	No objections, subject to conditions.
NSW Natural Resources Access Regulator (NRAR)	<p>Integrated referral rejected.</p> <p>The proposed use in its current form is not subject to a Controlled Activity Approval.</p> <p><u>Planner's Comment:</u> Should a new application be lodged; it may be referred to NRAR should further remediation works of the site be required in the future.</p>
TfNSW – RMS	<p>No objections, advisory comments provided.</p> <p>Refer to Section 9.3 of this assessment report.</p>

14. Public Consultation

The application was notified in accordance with Schedule 1 of the Environmental Planning and Assessment Act 1979. In response five (5) unique submissions were received. The issues raised within those submissions are addressed below and have been grouped and summarised to avoid repetition.

Issue	Response
Concerns are raised with regards to the continuing ongoing acoustic impacts generating from the unauthorised use. The acoustic report is not accurate. The temporary noise action plan is not being adhered to.	Council has considered the ongoing complaints from residents. The Applicant's submitted acoustic report was assessed and was considered unsatisfactory in terms of its suggestions to have effective control of the noise nuisance from the site. The acoustic report is therefore not supported in this instance.
Concerns are raised with regards to the land use.	The proposed land use is permissible with consent on land zoned as IN3 Heavy Industrial. Notwithstanding, the acoustic impacts and hours of operation of the proposed land use has been considered in the assessment of this application.
Concerns are raised with regards to the 24/7 hours of operation being excessive.	The proposed hours of operation are excessive and are therefore not supported.
There is confusion between the referenced DA numbers in the submitted Environmental Impact Statement and the extent of the use on site.	The correct DA number for this application is DA/1055/2021 and the use is located on Lease Area 2 (refer to Figure 3 above). The referenced numbers in the submitted documents are purely reference numbers for the applicant's consultants who prepared those documents.

Note: The submissions received were the same proforma format with some variations.

Amended Plans

No

15. Conciliation Conference

On 11 December 2017, Council resolved that:

"If more than 7 unique submissions are received over the whole LGA in the form of an objection relating to a development application during a formal notification period, Council will host a conciliation conference at Council offices."

Conciliation Conference – Not Required

The application received five (5) unique submissions during the formal notification period and as a result a Conciliation Conference was not required to be held. In addition, Council's Crisis Management Team suspended all Conciliation Meetings from 25 March 2020, for the foreseeable future, due to COVID19 and maintaining social distancing requirements.

16. Development Contributions

In accordance with Council's *City of Parramatta (Outside CBD) Development Contributions Plan 2021*, a Section 7.11 Development Contribution is required to be paid. A condition would have been imposed requiring the contribution to be paid should the application be recommended for approval.

17. Bonds

As the development in its current form does not propose for any works, security bonds therefore do not apply to the applications.

18. EP&A Regulation 2021

Applicable Regulation considerations would have been addressed by appropriate consent conditions, should the application be recommended for approval.

19. Conclusion

The proposal has been assessed in accordance with Section 4.15(1) of the Environmental Planning and Assessment Act 1979. The proposal is not consistent with the relevant requirements of the State Environmental Planning Policy

Page 17 of 19

(Resilience and Hazards) 2021, State Environmental Planning Policy (Biodiversity and Conservation) 2021, State Environmental Planning Policy (Transport and Infrastructure) 2021, Parramatta Local Environmental Plan 2011 & Parramatta Development Control Plan 2011.

The proposed land use in its current form is not considered to be suitable as it has not had satisfactory consideration of the outstanding earthworks and contamination issues on site, acoustic impacts, stormwater and flooding impacts and waste management.

The application has been assessed under Section 4.15 of the Environmental Planning and Assessment Act 1979, taking into consideration all relevant State and local planning controls. On balance, the proposal demonstrates an unsatisfactory response to the objectives and controls of the applicable planning framework. The proposal is not suitable for the site and is not in the public interest. As such, the application is recommended for refusal.

20. Recommendation

REFUSAL

Pursuant to Section 4.16(1)(b) of the *Environmental Planning and Assessment Act 1979*:

- (a) **That** the Parramatta Local Planning Panel (PLPP), exercising the functions of Council, **refuse** development consent to DA/1055/2021 for development consent for use of part of the site as a freight transport facility at 37A Grand Avenue, Camellia NSW 2142 for the following reasons:

1. State Environmental Planning Policy (Resilience and Hazards) 2021

- a. Pursuant to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979*, insufficient information has been submitted to demonstrate that the site is suitable for the proposed use under the provisions of Clause 4.6 of SEPP (Resilience and Hazards) 2021.

2. State Environmental Planning Policy (Biodiversity and Conservation) 2021

- a. Pursuant to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979*, insufficient information has been submitted to demonstrate that the property and proposed use are consistent with the provisions of Clause 2.7, 2.8 & 2.10 of SEPP (Biodiversity and Conservation) 2021.

3. Parramatta Local Environmental Plan 2011

- a. Pursuant to Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979*, the proposed development does not meet compliance and/or consist of insufficient information to determine its compliance to the following matters of the *Parramatta Local Environmental Plan 2011*:
- i. Objectives IN3 Heavy Industrial: The proposed land use has not taken into consideration the context and setting of the subject site as the use will generate undue adverse effects of industry on the R2 Low Density Residential zoned properties to the north of the site as a result of acoustic and dust impacts.
 - ii. Clause 5.10 Heritage conservation: Insufficient information has been submitted to demonstrate that the contaminated material on site will not cause adverse impact to *11 Wetlands* located along the property's Parramatta River foreshore.
 - iii. Clause 5.21 Flood planning: Insufficient information has been submitted to demonstrate that the use is appropriate to the property's flood affectation.
 - iv. Clause 6.2 Earthworks: Insufficient information has been submitted to demonstrate that the earthworks undertaken on the property without consent are in accordance with Clause 6.2(3) of LEP 2011, and that it will not create detrimental effects to the Parramatta River.
 - v. Clause 6.5 Water Protection: Insufficient information has been submitted to demonstrate that the existing capping on site is sufficient to contain the contaminated material from seeping into the riparian land.

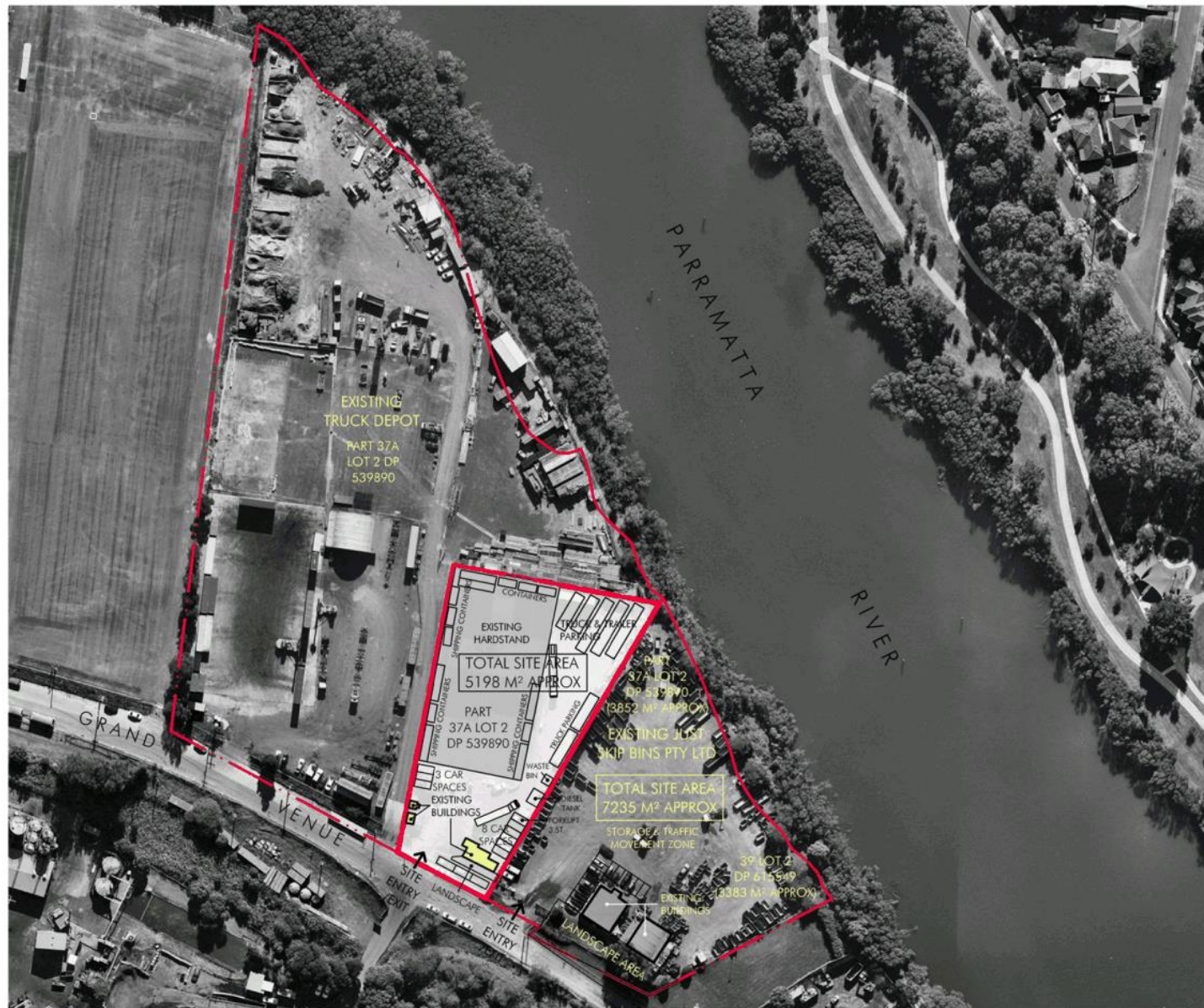
- vi. Clause 6.7 Affected by a foreshore building line: Insufficient information has been submitted to demonstrate that the existing capping on site is sufficient to contain the contaminated material and will not cause adverse impact to the surrounding foreshore area.

4. Parramatta Development Control Plan 2011

- a. Pursuant to Section 4.15(1)(a)(iii) of the *Environmental Planning and Assessment Act 1979*, the proposed development does not meet compliance and/or consist of insufficient information to determine its compliance to the following matters of the *Parramatta Development Control Plan 2011*:
 - i. Section 2.4.2 Water Management
 - ii. Section 2.4.3 Soil Management
 - iii. Section 3.3.3 Visual and Acoustic Privacy
 - iv. Section 3.3.6 Water Sensitive Urban Design
 - v. Section 3.3.7 Waste Management
 - vi. Section 3.5 Heritage

5. Environmental Planning and Assessment Act 1979

- a. Pursuant to Section 4.15(1)(b) and (c) of the *Environmental Planning and Assessment Act 1979*, the site is not considered suitable for the proposed development.
 - b. Pursuant to Section 4.15(1)(d) and (e) of the *Environmental Planning and Assessment Act 1979*, the adverse impacts generated by the development due to non-compliance with the applicable planning controls are detrimental to the established residential community within the vicinity and as such, it is not considered to be in the wider public interest.
- (b) **Further, that** submitters be advised of the decision.



LOT DETAILS
ADDRESS: PART 37A GRAND AVENUE CAMELLIA NSW 2142
TITLE: PART LOT 2/DP539890
PROPERTY ID: N/A
LOT AREA (APPROX): 5198 M ²
APPLICABLE PLANNING CONTROLS
PARRAMATTA LEP 2011 (MAP TILE 015)
LAND ZONING: IN3 HEAVY INDUSTRIAL
FSR: 1:1
HEIGHT OF BUILDING: 9M

Site 02, 2021, 1:40 Jan N12291_Siteplan.dwg C:\012291_DA002[P4].dwg

STREAMLINE
CONTAINER SERVICES

Site Plan

Part 37A Grand Avenue, Camellia, NSW (Part Lot 2 DP539890)

July, 2021

SITE PLAN
1:1250 (A3)
12291_DA002[P4]

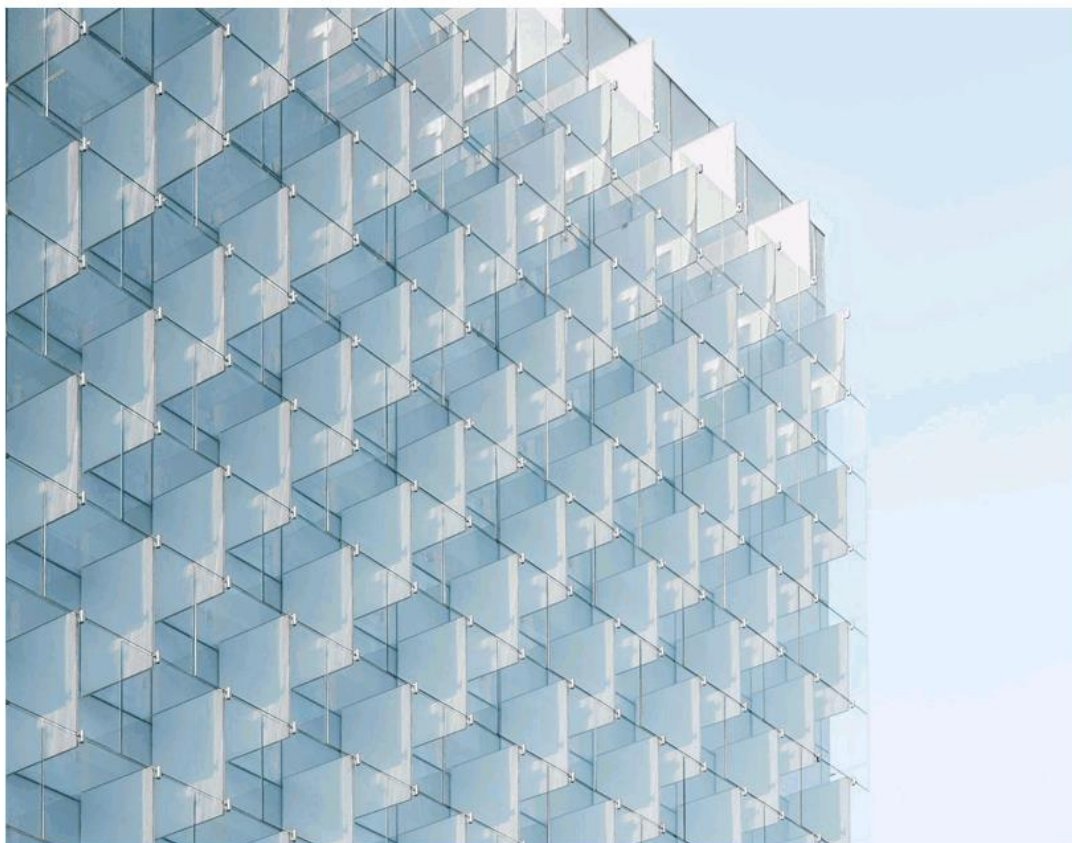
nettleontribe

WILLOWTREE PLANNING



22 October 2021

Ref: WTJ21-332
Contact: Hugh Walker



ENVIRONMENTAL IMPACT STATEMENT

Change of Use from a Truck Depot to a Freight Transport Facility with
24/7 Operational Use

37A-39 Grand Avenue, Camellia
Lot 2 DP539890 & Lot 2 DP615548

Prepared by Willowtree Planning Pty Ltd on behalf of Streamline
Container Streamline Container Services Pty Ltd.

ACN: 146 035 707 ABN: 54 146 035 707
Suite 4, Level 7, 100 Walker Street
North Sydney, NSW 2060

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Proposed Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)



DOCUMENT CONTROL TABLE		
WTJ21-332		
Prepared by	Checked by	Approved by
Hugh Walker Town Planner	Travis Lythall Associate	Andrew Cowen Director
<i>Hugh Walker</i>	<i>T Lythall</i>	<i>Andrew Cowen</i>

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Proposed Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)



CLAUSE 4.12(8) CERTIFICATE

Declaration Form

Submission of Environmental Impact Statement (EIS)

prepared under the *Environmental Planning and Assessment Act 1979*

Clause 4.12(8)

EIS Prepared By

Name

Hugh Walker

Qualifications

Bachelor of Urban and Regional Planning, UNE

Address

Suite 7, Level 7, 100 Walker St
North Sydney NSW 2060

EIS Reviewed By

**Travis Lythall - Associate
Andrew Cowen - Director**

In Respect Of

Proposed Change of use

Development Application

Applicant Name

Streamline Container Services Pty Ltd.

Address

37A-39 Grand Avenue, Camellia

Land to be Developed

37A-39 Grand Avenue, Camellia
(Lot 2, DP539890 & Lot 2 DP615549)

EIS

This document contains a complete EIS

Certificate

I certify that I have prepared the contents of this EIS and to the best of my knowledge:

- it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*,
- contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and
- that the information contained in the statement is neither false nor misleading.

Signature

Name

Hugh Walker

Qualification

Bachelor of Urban and Regional Planning UNE

Date

22/10/2021



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Proposed Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

**Signature**

Name
Qualification

Travis Lythall
Bachelor of Science UoN

Date

22/10/2021

Signature

Name
Qualification

Andrew Cowen
Bachelor of Urban and Regional Planning UNE

Date

22/10/2021



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Proposed Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)



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GLOSSARY OF TERMS

Term	Meaning
TERM	MEANING
AHIMS	Aboriginal Heritage Information Management System
BAM	Biodiversity Assessment Methodology
PCC	Parramatta City Council
BCA	Building Code of Australia
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
PLPP	Parramatta Local Planning Panel
BOS	Biodiversity Offset Scheme
CBD	Central Business District
CIV	Capital investment value
Coastal Management SEPP	<i>State Environmental Planning Policy (Coastal Management) 2018</i>
DCP	Development Control Plan
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPA	Environment Protection Authority
EPBC Act	<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GFA	Gross Floor Area
GSC	Greater Sydney Commission
PDCP 2011	<i>Parramatta Development Control Plan 2011</i>
ISEPP	<i>State Environmental Planning Policy (Infrastructure) 2007</i>
LGA	Local Government Area
NSW DPIE	NSW Department of Planning, Industry and Environment



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NSW RMS	NSW Roads and Maritime Services
OEH	NSW Office of Environment and Heritage
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
SEARs	Secretary's Environmental Assessment Requirements (SEAR 1605), dated 3 September 2021
SEPP	State Environmental Planning Policy
SEPP 33	<i>State Environmental Planning Policy No. 33 – Hazardous and Offensive Development</i>
SEPP 64	<i>State Environmental Planning Policy No 64—Advertising and Signage</i>
Sqm or m²	Square metres
site/site/study area	37A – 39 Grand Avenue, Camellia.
Willowtree Planning	Willowtree Planning Pty Ltd



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Proposed Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)



EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), to accompany a Designated Development Application (DA) which seeks development consent to regulate a partial change of use pertaining to the Freight Transport Facility operating on a portion of Lot 2 in DP539890. The use has been deemed unlawful as operations were outside the scope of the approved Truck Depot articulated within **DA/590/2018**. This EIS has been prepared on behalf Streamline Container Services Pty Ltd (the applicant) and has been prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued 3 September 2021 by the NSW Department of Planning, Industry and Environment (DPIE).

The existing Truck Depot in which Streamline Container Services operate at 37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549) (the Site), was approved under **DA/509/2018**, subject to both Lot 2, DP539890 and Lot 2 DP615549. Both allotments are mapped within 'Proximity Area to Coastal Wetlands'; however, a small section of Lot 2 DP615549 (south-eastern corner) is mapped as containing 'Coastal Wetlands' pursuant to *State Environmental Planning Policy (Coastal Management) 2018* (Coastal Management SEPP).

Under the *Environmental Planning and Assessment Act 1979* (EP&A Act), it is required that a request for SEARs must be made prior to the lodgement of any application for designated development. SEARs were requested for the proposal (reference: SEAR 1605) and later issued by the NSW DPIE on the 3 September 2021 (refer to **Appendix 2**).

The NSW DPIE referred the SEARs to Transport for NSW (TFNSW) for review, requesting additional issues to be addressed as part of the traffic and transport assessment for the proposal. The SEARs requires that the EIS must address the provisions of the:

- *State Environmental Planning Policy (Coastal Management) 2018* – (Coastal Management SEPP)
- *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017*– (Vegetation in Non-Rural Areas SEPP)
- *State Environmental Planning Policy (Infrastructure) 2007* – (Infrastructure SEPP)
- *State Environmental Planning Policy No 33–Hazardous and Offensive Development* (1992 EPI 129) – (Hazardous and Offensive Development SEPP)
- *State Environmental Planning Policy No 55–Remediation of Land* (1998 EPI 520) – (Remediation of Land SEPP)
- *Parramatta Local Environmental Plan 2011* (PLEP2011)
- relevant development control plans and Section 7.11 plans.

The proposal satisfactorily addresses the SEARs issued on 3 September 2021. These are summarised below in **Table 1**. As such, it is recommended that the proposal be supported by Council.

In addition to the general requirements, the SEARs for the proposal outlined a number of Key Issues to be addressed as part of an EIS, including:

- Strategic Context
- Suitability of the site
- Noise and Vibration
- Traffic and Transport
- Biodiversity
- Waste Management
- Soil and Water



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- Air quality
- Heritage (Assessment)

The likely impacts of the proposal have been examined in depth, and the assessments undertaken demonstrate that all potential environmental impacts may be suitably managed. The surrounding context has been accounted for in the analysis, and the amenity of neighbouring properties has been shown to be appropriately safeguarded via implementation of planned management and mitigation measures.

The proposal is considered appropriate for the location and should be supported by the consent authority for the following reasons:

- Compliance with the objectives and provisions of the PLEP2011;
- The proposal demonstrates consistency with the objectives and directions of relevant State and Regional planning policies and strategies;
- The proposal is suitable for the Site as evidenced by the site analysis and various Site investigations;
- The proposal would not result in any unacceptable, long term, offsite environmental impacts on adjoining or surrounding properties or the public domain; and
- Consultation has been completed in accordance with the NSW DPIE Consultation Guidelines.

In summary, the proposed use is supportable from a technical viewpoint and satisfies relevant Government policies. It provides significant benefits for a wide range of stakeholders and is in the general public interest. Further, the proposal has addressed the individual matters listed in the SEARs and is supported and justified through accompanying technical studies.

As such, the proposed change of use (partial) of the Site from a Truck Depot to a Freight Transport Facility warrants the support of the consent authority and we therefore recommend that approval be granted.

PROJECT DESCRIPTION

Development Consent under this proposal is sought for a change of use (including partial change of use) across the Site to the existing use as a Truck Depot to regularise a selected portion of the Site for the purposes of a Freight Transport Facility, which was deemed unlawful as operations were outside the scope of the consent articulated within **DA/590/2018**. Specifically, the operational activities carried out by Streamline Container Services Pty Ltd on the Site include:

- Additional storage and manoeuvring of shipping containers;
- Operational use and maintenance of heavy vehicles and associated machinery; and
- Operational use of the Site for 24 hours, 7 days a week.

PLANNING AND LEGISLATIVE FRAMEWORK

All relevant legislation and environmental planning instruments, have been considered in the preparation of this EIS. The proposal is considered to be satisfactory in terms of its legislative context, on the basis that:

- The proposal is permissible in the IN3 Heavy Industrial zone;
- The objectives of the zone are satisfied;
- The applicable EPIs have been considered;
- Strategic documents that apply to the locality and wider region have identified that the proposed use is consistent with the strategic context of the area; and
- The proposed development can satisfy the relevant provisions of the BCA and applicable Australian Standards.



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PUBLIC NOTIFICATION AND CONSULTATION

A range of authorities have been consulted with during the preparation of this application. These include NSW DIPE specifically Water Group, Transport for NSW (TFNSW), Deerubbin Local Aboriginal Land Council, City of Parramatta Council and the surrounding landowners and occupiers that are likely to be impacted by the proposal.

ENVIRONMENTAL IMPACT ASSESSMENT

An assessment of environmental impact has been undertaken against the relevant planning controls and policies. Additionally, a number of expert consultants have been engaged to specifically consider relevant aspects of the proposal. As a result, the proposal complies with the relevant controls and it is considered that appropriate mitigation measures can be put in place to minimise any identified risks.

The proposed use is considered acceptable in a legislative sense.

JUSTIFICATION FOR THE PROPOSAL

Thorough consideration of the environmental impacts of the proposal has been undertaken in the environmental impact assessment process and in the preparation of this EIS. In assessing the impacts of the proposed use, consideration has been given to social, economic and environmental matters. As identified in **PART H**, the proposed use is not considered to represent an environmental risk, or a development that might be out of context with the surrounding locality.

OVERVIEW

The findings of this EIS, are that the proposed use can proceed. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the Site. Furthermore, the proposed Freight Transport Facility is consistent with the objectives of the Coastal Management SEPP, Vegetation in Non-Rural Areas SEPP, Infrastructure SEPP, Hazardous and Offensive Development SEPP, Remediation of Land SEPP, PLEP2011, PDGP2011 and section 7.11 plans

Based on the findings of this EIS, the Site can successfully support a Freight Transport Facility, inclusive of related development, under this application, with acceptable environmental impacts. The proposed use is a contiguous and logical use of a unique heavy industrial Site, containing several constraints.

The proposed use is deemed suitable for its intended purpose, having regard to its regional and local context and would not result in any significant environmental impacts. As such, it is requested that the proposed use be approved, subject to reasonable and relevant conditions.



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PART A PRELIMINARY

1.1 INTRODUCTION

This EIS is submitted to the Council pursuant to Part 4 of the EP&A Act in support of a Designated Development pursuant to Clause 10(2) of the Coastal Management SEPP. This EIS has been prepared by Willowtree Planning on behalf of Streamline Container Services Pty Ltd, in accordance with the Secretary's Environmental Assessment Requirements (SEARs) dated 3 September 2021.

The subject DA seeks consent for designated development, being for a change of use (including partial change of use) across the Site to the existing use as a Truck Depot to regularise a selected portion of the Site for the purposes of a Freight Transport Facility, which was deemed unlawful as operations were outside the scope of the consent articulated within **DA/590/2018** on land at 37A-39 Grand Avenue, Camellia, being legally described as as Lot 2, DP539890 and Lot 2 DP615549 (the Site).

The particulars of this proposal are summarised below:

- Additional storage and manoeuvring of shipping containers;
- Operational use and maintenance of heavy vehicles and associated machinery; and
- Operational use of the Site for 24 hours, 7 days a week.

This EIS describes the Site and proposed development, provides relevant background information, responds to the SEARs and assesses the proposed development in terms of the relevant matters set out in relevant legislation, Environmental Planning Instruments (EPIs) and Planning Policies.

The structure of the EIS is as follows:

- **Part A** Preliminary
- **Part B** Site Analysis
- **Part C** Legislative and Policy Framework
- **Part D** Statutory Framework
- **Part E** Strategic Planning Framework
- **Part F** Consultation
- **Part G** Environmental Risk Assessment
- **Part H** Project Justification
- **Part I** Conclusion

1.2 THE PROJECT TEAM

The DA has been prepared by a project team comprising the qualified experts listed in **Table 1** below.

Table 1. PROJECT TEAM				
Discipline	Consultant	Technical input	Date	Appendix
Planning	Willowtree Planning	Environmental Impact Statement	12/10/2021	-
Planning	Willowtree Planning	DCP Compliance Table	12/10/2021	1



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SEARs	Department of Planning, Industry & Environment	SEARs Report	3 September 2021	2
Architecture	Nettletontribe Architecture	Architectural Drawings (Site Plan)	July 2021	3
Traffic	Ason Group	Traffic Impact Assessment	12/10/2021	4
Plan of Management	Streamline Container Services Pty Ltd.	Comprehensive Plan of Management	8/01/2021	5
Noise/Acoustic	Acousticworks	Noise Impact Assessment	24 August 2021	6
Biodiversity/Ecological Assessment	Cumberland Ecology	Ecological Assessment Report	21 September 2021	7
Waste Management	Streamline Container Services Pty Ltd.	Waste Management Plan	8/01/2021	8
Air Quality	North Star Air Quality	Air Quality Impact Assessment	8/1/2021	9
Owners Consent	Streamline Container Services Pty Ltd.	Owners Consent	12/10/2021	10
Council Heritage Item	Willowtree	Confirmation with Council - Heritage Item	18/01/2021	11
Consultation Letter to TFNSW	Willowtree	Consultation Letter	16/09/2021	12

1.3 THE PROPONENT

The proponent is Streamline Container Services Pty Ltd. See **Table 2** for contact details.

Table 2. PROPONENT DETAILS

Contact Name	Rita Badhan
Company Details	Streamline Container Services Pty Ltd
Contact Number	0424 243 270

1.4 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

In accordance with Section 4.22 of the EP&A Act, SEARs were issued by the Secretary of the NSW DPIE on 3 September 2021 (**Appendix 2**).



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Table 3 outlined below provides a detailed summary of the individual matters listed in the SEARs and identifies where each of these requirements has been addressed in this EIS and accompanying technical studies.

This EIS is also consistent with Clause 6 and 7 of Schedule 2 of the EP&A Regulation which specifies the minimum requirements for environmental impact statements.



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WILLOWTREE PLANNING



22 October 2021

Ref: WTJ21-332

Contact: Hugh Walker

Table 3: How SEARs have been satisfied	
Requirements	Response
General Requirements	
Ensure that the EIS meets the minimum form and content requirements outlined in Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> .	This EIS has been prepared in accordance with Clauses 6 & 7 of Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> (EP&A Regulation). The structure of this EIS addresses all legislative requirements set out in the EP&A Regulation.
Key Issues	
strategic and statutory context - including: <ul style="list-style-type: none"> a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out a description of how the proposed development integrates with existing onsite operations a description of any amendments to and/ or additional licence(s) or approval(s) required to carry out the proposed development. 	Refer to Section 2.4
Suitability of the Site - including: <ul style="list-style-type: none"> a detailed justification that the site can accommodate the proposed development, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures plans depicting the proposed layout, including the location of shipping containers, buildings, machinery and equipment. 	Refer to Section 2.6
Noise and Vibration - including:	Refer to Section 7.4 & Appendix 7



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<ul style="list-style-type: none"> a description of all potential noise and vibration sources during operation, including road traffic noise and noise from vehicles entering, exiting and manoeuvring throughout the site a noise and vibration assessment, including cumulative impacts associated with existing operations, in accordance with the relevant Environment Protection Authority guidelines a description and appraisal of noise and vibration mitigation and monitoring measures. 	
Traffic and Transport - including: <ul style="list-style-type: none"> details of road transport routes and access to the site road traffic predictions for the development during operation, including consideration of existing on-site operations swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development. 	Refer to Section 7.3 & Appendix 5
Biodiversity - including: <ul style="list-style-type: none"> accurate predictions of any vegetation clearing on site an assessment of the potential impacts on any threatened species, populations, endangered ecological communities or their habitats, including mangroves and other marine vegetation a detailed description of the measures to avoid, minimise, mitigate and/or offset biodiversity impacts. 	Refer to Section 7.5 & Appendix 8
Waste Management - including: <ul style="list-style-type: none"> details of waste handling including, transport, identification, receipt, stockpiling and quality control including off-site reuse and disposal the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Waste Avoidance and Sustainable Materials Strategy 2041. 	Refer to Section 7.6 & Appendix 9
Soil and Water - including: <ul style="list-style-type: none"> a description of local soils, topography, drainage and landscapes 	Refer to Section 7.8



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<ul style="list-style-type: none"> ▪ details of water usage for the proposal including existing and proposed water licencing requirements in accordance with the Water Act 1912 and/or the Water Management Act 2000 ▪ an assessment of potential impacts on floodplain and stormwater management and any impact to flooding in the catchment ▪ details of sediment and erosion controls - an assessment of the potential impacts of the proposal in line with the Natural Resource Access Regulators' Guidelines for controlled activities on waterfront land ▪ an assessment of potential impacts on the quality and quantity of surface and groundwater resources ▪ details of any augmentation to existing stormwater and wastewater management systems (including sewage), and measures to mitigate surface and groundwater impacts ▪ characterisation of the nature and extent of any contamination on the site and surrounding area including an assessment against the provisions of SEPP 55 - Remediation of Land. 	
<p>Air Quality - including:</p> <ul style="list-style-type: none"> ▪ a description of all potential sources of air and odour emissions during operation ▪ an air quality impact assessment, including cumulative impacts associated with existing operations, in accordance with relevant Environment Protection Authority guidelines ▪ a description and appraisal of air quality impact mitigation and monitoring measures. 	Refer to Section 7.9 & Appendix 9
<p>Heritage - including</p> <ul style="list-style-type: none"> ▪ an assessment of Aboriginal and non-Aboriginal cultural heritage 	Refer to Section 7.7.7
Other Requirements	
The EIS must address the provisions of the <i>State Environmental Planning Policy (Coastal Management) 2018</i> .	This EIS has addressed the provisions of the Coastal Management SEPP - refer to Section 4.10
Consultation Requirements	



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<p>Ensure that the EIS is prepared in consultation with:</p> <ul style="list-style-type: none"> • Department of Planning, Industry and Environment, specifically the: Water Group • Transport for NSW • Deerubbin Local Aboriginal Land Council • City of Parramatta Council • the surrounding landowners and occupiers that are likely to be impacted by the proposal. Details of the consultation carried out and issues raised must be included in the EIS. 	<p>This EIS has been prepared in consultation with Parramatta City Council, DPIE (Water Group), Transport for NSW, Deerubbin Local Aboriginal Land Council, and the surrounding landowners and occupiers.</p>
<p>Further Consultation after 2 years</p>	
<p>If you do not lodge an application under Section 4.12(8) of the Environmental Planning and Assessment Act 1979 within 2 years of the issue date of these SEARs, you must consult with the Planning Secretary in relation to any further requirements for lodgement.</p>	<p>Noted.</p>



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PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The Site is identified as 37A-39 Grand Avenue, Camellia located on the north-eastern edge of Grand Avenue and between the Parramatta River, or legally described as Lot 2, DP539890 and Lot 2 DP615549. The Site is an irregular shaped allotment and is generally flat however, falls towards the rear of the Parramatta River.

Existing Site attributes are noted as follows:

- The Site is located in the suburb of Camellia which forms part of the Parramatta Local Government Area (LGA), in Western Sydney. The Site is zoned IN3 – Heavy Industrial under the provisions of PLEP2011;
- The Site comprises a total area of approximately 7,235 m² with a frontage of 72.1 m to the Grand Avenue.
- The Site forms a larger IN3 Heavy Industrial Precinct comprise of adjoining industrial land uses and land zoned IN3 Heavy Industrial including Concrete Recyclers, Waste Management Services, Sydney Metro Plan Yard, plastering suppliers;
- It is noted that the proposed operational use of the Site, for the purposes of a Freight Transport Facility will only be undertaken in a portion of the Site to the southeast of 37A Grand Avenue illustrated in **Figure 2** Figure 2: Aerial Map of the Site and Surrounding Area (Source: Nearmaps, 2021) and **Figure 3**.
- The Site is mapped as containing areas of coastal wetland under the provisions of the Coastal Management SEPP;
- A majority of the 37A Grand Avenue towards the north-west is currently used as a temporary bus depot approved under **DA/986/2017**.
- Consent was granted under **CD99/2018** for partial use of the hardstand area of 37A Grand Avenue for a Truck Depot and storage of bins with associated car parking.

In its existing state, the Site operates a section of as Streamline Container Services, a Truck Depot for storage of skip bins and shipping containers approved under **DA/509/2018**. It is understood that the Site accommodates both Streamline Container Services, Just Skip Bins Pty Ltd and other IN3 premises which has been granted development consent under **DA/509/2018**. Vehicular access to the Site is provided via Grand Avenue.

An aerial photograph and cadastral image of the Site, further illustrating the site's characteristics and specific section of the Site which Streamline Container Services operate in, provided in **Figures 1-3** below.



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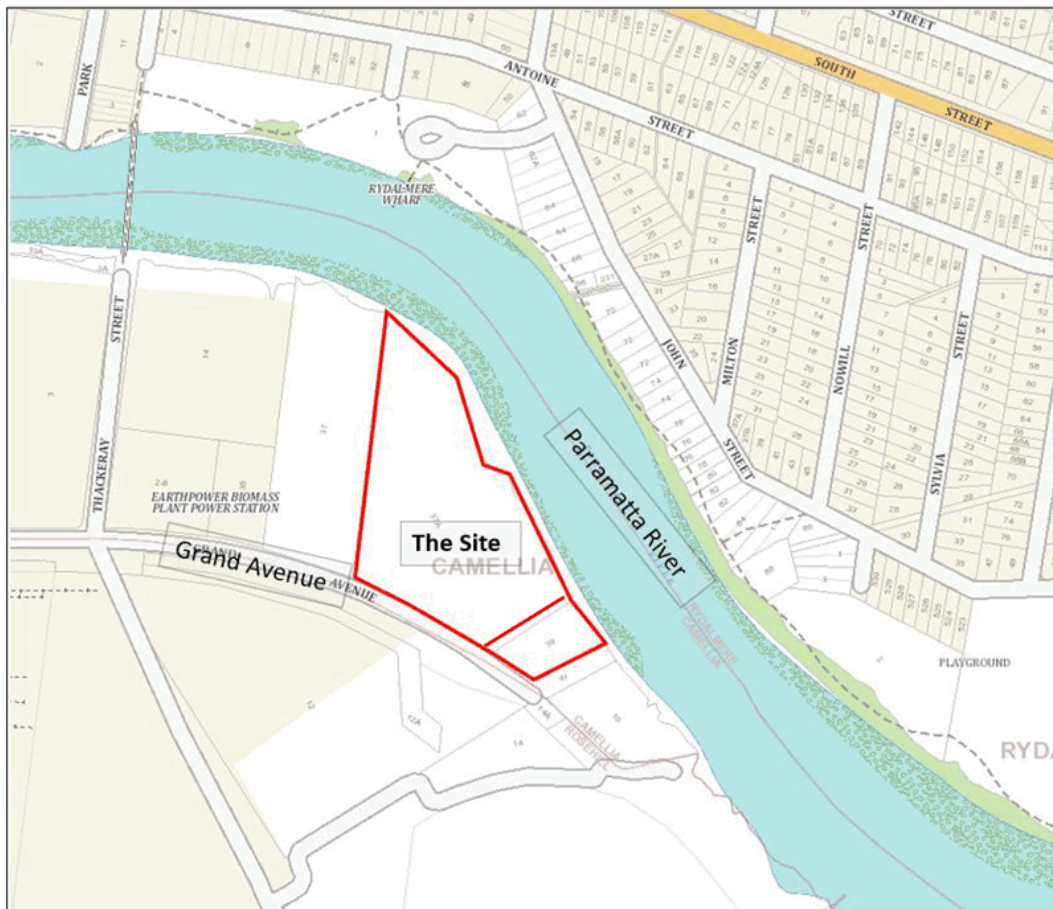


Figure 1: Cadastral Map of the Site and Surrounding Area (Source: SIX Maps, 2021)

Figure 1 above shows the Site and contextually illustrates the surrounding area, positioned between the Grand Avenue (east) and the Parramatta River.



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Figure 2: Aerial Map of the Site and Surrounding Area (Source: Nearmaps, 2021)

Figure 2 illustrates the footprint of the Site from an aerial perspective and provides context with regard to surrounding developments in close proximity to the Site. Highlighted in yellow is the specific portion of Lot 2 DP539890 in which Streamline Container Services operate.



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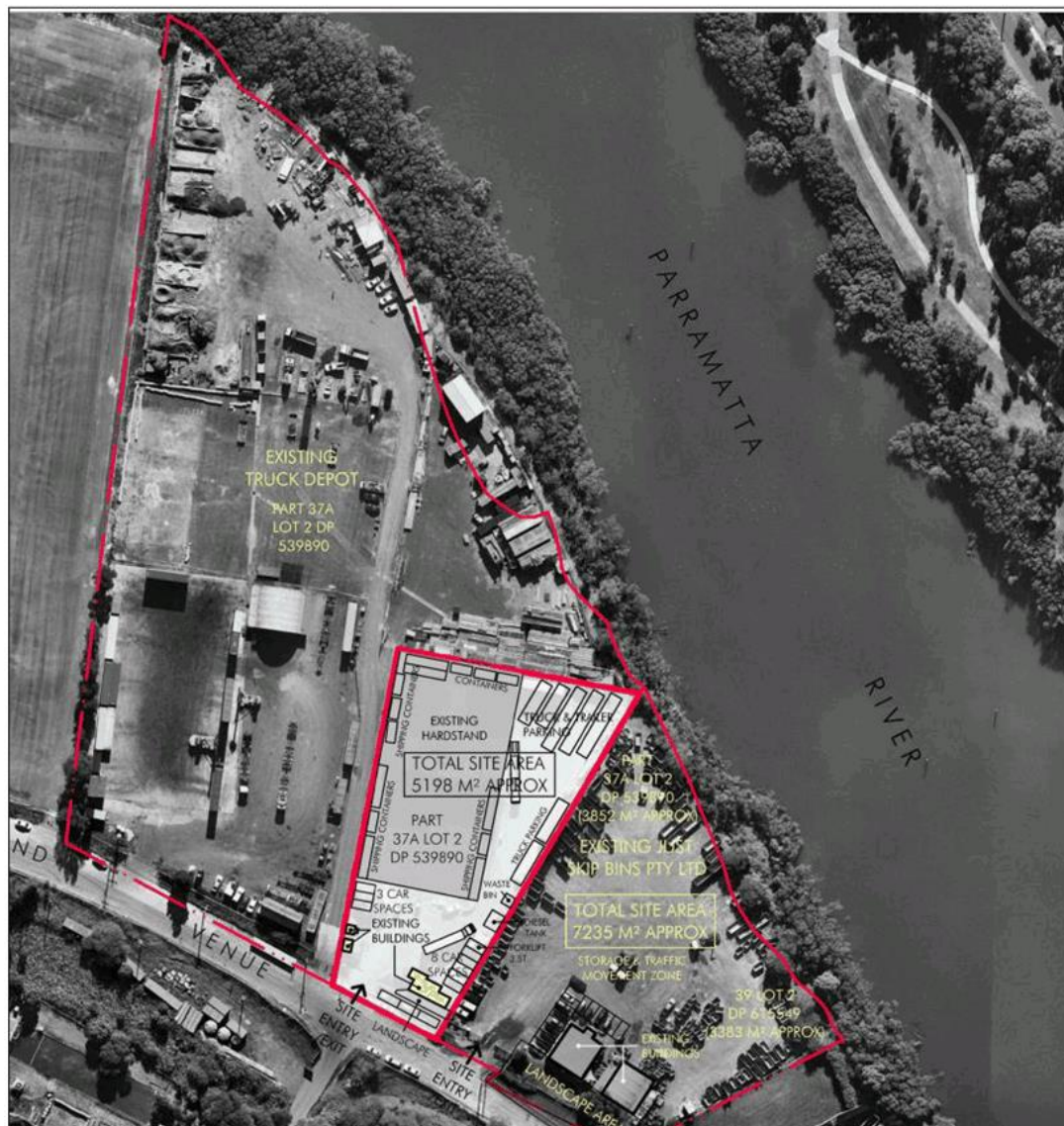


Figure 3: Site Plan showing section of the Site operated by Streamline Container Services (Source: Nettletontribe, 2021)

Figure 3 illustrates separation between the Lot 2 DP539890 and Lot 2 DP615549 and the partial section of Lot 2 DP539890 in which Streamline Container Services operate in.



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2.2 LAND OWNERSHIP

The land which is the subject of this application is under ownership of Camellia Grande Pty Ltd. Owners Consent can be found at **Appendix 10**.

2.3 LOCAL AND REGIONAL CONTEXT

The Site is located in the suburb of Camellia forming part of the wider Parramatta LGA.

The immediate Site context exhibits an IN3 Heavy Industrial character, being development as part of the Camellia Precinct and is surrounded by similar heavy industrial development. Other land uses in the vicinity of the Site include:

- **North** – across the Parramatta River sits the suburb of Rydalmere comprising IN1 Light Industrial land and R2 Low-Density Residential. Situated between the Parramatta River and Rydalmere is a RE1 Public Recreation corridor and Rydalmere Wharf.
- **South** – comprises the suburb of Silverwater predominately zoned IN1 General Industrial across a section of the Duck River.
- **East** – comprises a section of the suburb of Ermington, with mixed R4 High-Density Residential and R2 Low-Density Residential. Situated between Ermington and the Site a section of the Parramatta River with another RE1 Public Recreation corridor.
- **West** – comprises the suburb of Rosehill predominantly zoned IN3 with a section zoned RE2 Environmental Conservation or commonly known as Rosehill Racecourse.



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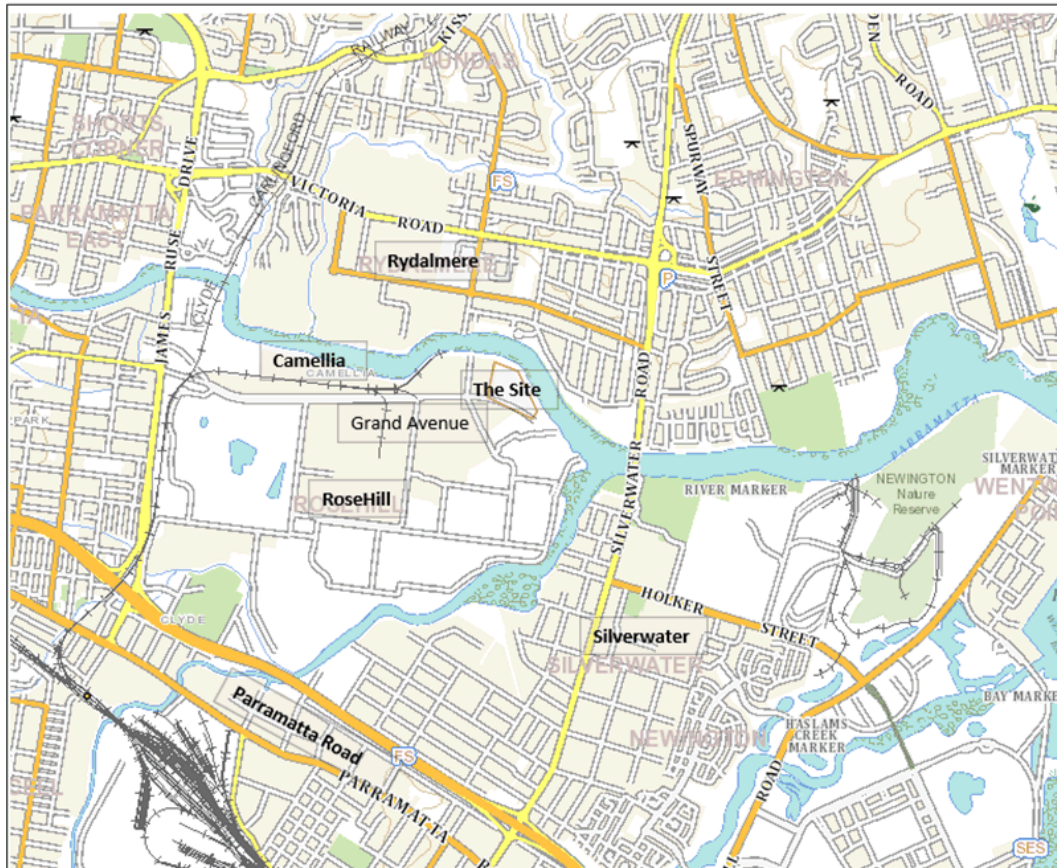


Figure 4: Site Context Map (Source: SIX Maps, 2021)

2.4 STRATEGIC CONTEXT

The Site is located within the suburb of Camellia forming the larger Camellia Precinct defined by Parramatta River to the north, Duck River to the east, the M4 Motorway to the south and James Ruse Drive to the west, all of which form physical boundaries to the precinct as illustrated in Figure 5. The precinct is approximately 321ha and situated 1.5km east of Parramatta CBD. Characterised predominantly by industrial uses, it is home to a number of significant businesses that provide employment across a range of industries. The Camellia Precinct is subject to Camellia Precinct - Land Use and Infrastructure Strategy 2015, the Precinct Planning Principles are as follows:

1. Increase job density by supporting a variety of employment opportunities across the precinct.
2. Allow for some mixed-use development, including residential, in the north-western quadrant of the precinct, concentrated around the future Western Sydney Light Rail alignments and with primary access from James Ruse Drive and Grand Avenue.
3. Create an industry-leading entertainment precinct at Rosehill Racecourse, which can serve as a buffer between the mixed use and industrial uses within the precinct.



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4. Retain the majority of the southern and eastern part of the precinct for industrial uses, but facilitate its transition to more contemporary industries including clean technologies, eco-industries, advanced manufacturing and logistics.
5. Provide an integrated transition zone in the northern part of the precinct along the Parramatta River adjacent to Grand Avenue, allowing for a complementary transition of land uses between the mixed-use precinct to the west and industrial precinct in the east.
6. Provide for vehicular connections between Camellia, Silverwater, Rydalmere and the M4 to mitigate heavy vehicle movements through mixed use development.
7. Improve access to public transport in the precinct by focusing new development around transport nodes.
8. Create a network of public open spaces to improve active transport connectivity to, through and within the precinct.
9. Investigate opportunities for additional public facilities and infrastructure to support the expected demand for services at Camellia.
10. Establish design guidelines to deliver high quality urban environments within Camellia that result in enhanced amenity for residents, workers and visitors alike.

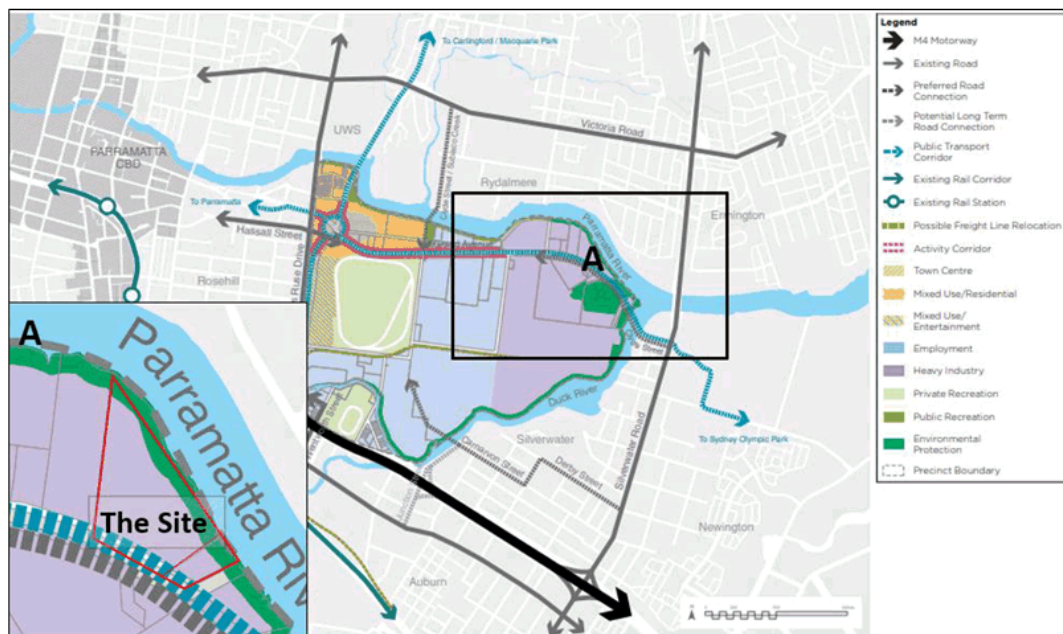


Figure 5: Site Area Locality and land use Character – Camellia Precinct (Source: NSW DPIE, 2015).

The Proposal is considered entirely consistent with and responsive to the above priorities, continuing a valuable contribution to the Heavy Industrial section within the Camellia Precinct. Regulating the existing Freight Transport Facility with 24-hour operations on the Site maximises job opportunities in an industry



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playing a vital role in the efficient transportation and handling of freight in Australia. In turn, contributing to economic growth and development in the immediate and wider localities of Sydney.

The Strategic Context is further reinforced within **Section 5.1** of this EIS.

As the Proposed Development is totally consistent with the objectives of the PLEP2011; *A Metropolis of Three Cities; Central City District Plan, Camellia Precinct – Land use and Infrastructure Strategy 2015*, it is considered to be orderly development and consistent with the strategic vision for the region within the Parramatta LGA and Sydney's Greater Parramatta to Olympic Peninsula priority growth area.

Given the strong alignment of the proposal, it is deemed appropriate, that the Local Planning Panel, endorse and support the Proposal on behalf of Parramatta City Council.

2.5 SITE / DEVELOPMENT HISTORY

A review of Parramatta Council's online DA tracking system indicates previous planning history **Table 4** outlined below includes a summary of the DAs pertaining to the Site that have been determined.

Table 4: Previous Consents		
Application ID	Description	Determination
DA/590/2018	Change of use to truck depot including storage of recycling skip bins and shipping containers and installation of a diesel fuel tank. The proposed development is identified as Integrated Development for the purpose of the Water Management Act 2000.	Approved – 19 December 2018
DA/590/2018/A	Section 4.55 (1) modification to approved DA/590/2018 for a change of use to truck depot including storage of recycling skip bins and shipping containers and installation of a diesel fuel tank. Modifications include correction to approved hours of operation (Condition 30).	Approved – 1 February 2019
DA/590/2018/B	Section 4.55(1A) modification for the approved DA/590/2018 modification to approved DA/590/2018 for a change of use to truck depot including storage of recycling skip bins and shipping containers and installation of a diesel fuel tank. Modifications include deletion of Condition 12 relating to stormwater drainage and amending conditions 7, 11, 20, 22, 38, 42, 43 and 44 of the development Consent.	Approved – 1 October 2020
DA/986/2017	DA/986/2017 approved the use of part of 37A Grand Avenue for the purposes of a temporary bus depot. The application was approved under delegation.	Approved – 8 March 2018
CD/99/2018	CD/99/2018 granted consent for partial use of the hardstand area of 37A Grand Avenue for a truck depot and storage of bins with associated car parking spaces.	Approved – 19 February 2018
CD/97/2018	CD/97/2018 granted consent for the installation of storage containers and bins and a diesel tank and	Approved – 19 February 2018



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37A-39 Grand Avenue, Camellia Lot 2, DP539890 and Lot 2 DP615549



	use of the Site as a truck depot on 39 Grand Avenue.	
DA/433/2013	DA/433/2013 approved the remediation of land and demolition works on 39 Grand Avenue. The application was approved under delegation. The Occupation Certificate was issued on 19 August 2015	Approved – 20 December 2013

2.5.1 Summary of letter from Parramatta Council

The purpose of this proposal has been initiated from the tenant - Streamline Container Services to regulate the current use, as the premises has been operating outside the scope of the Consent **DA/590/2018**. There is no provision for the storage of shipping containers (except two referred to in Consent), or for the extensive heavy industrial activities during night-time operations and further, exceeding the extend of vehicular and container movements around the premises. As a result, the activities raised acoustic concerns from neighbouring properties to the north, impacting health and wellbeing during night-time operations.

The premise ceased operations between 10PM and 7AM, 7 days per week on 2 February 2021 following a Direction to Take Action (Direction) from Parramatta Council which followed a Noise Abatement Direction on 22 January 2021. This proposal seeks to justify to Parramatta Council that operations on the Site have been revised and suit the surrounding IN3 precinct, minimising any adverse impacts to neighbours and the amenity of the area.

As mentioned, the proposal includes provisions for a change of use (including partial change of use) across the Site to the existing use as a Truck Depot; and to regularise a selected portion of the Site for the purposes of a Freight Transport Facility, which was deemed unlawful as operations were outside the scope of the Consent articulated within **DA/590/2018**. Assessments pertaining to both Traffic and Acoustics have been prepared to support the proposed 24- hour Freight Transport Facility on the Site, addressing the suitability of the land use in relation to issues raised in Council's letter. Further to the above description of the proposed use, it should be noted that the operations will be contained to the existing hardstand areas on Site and will not occur within close proximity to the Parramatta River.

An Acoustic Assessment of the existing unlawful operational activities prepared by Acoustic Works can be found at **Appendix 7**. In accordance with council's requirements stated in a letter dated 15/12/2020, compliance with the night-time sleep disturbance criteria is required for the Site to operate. The nearest noise sensitive receiver location was One and two storey residential dwellings are located to the northeast at 27-31 Milton Street and 37-41 John Street (directly adjacent the Site, across the Parramatta River). The Acoustic Assessment found at noise levels associated with the on Site activities were found to satisfy the criteria. To ensure compliance with the sleep disturbance criteria is maintained further discussed in **Section 7.4** below.

A Traffic Impact Statement prepared by Ason Group concluding the proposal is supportable on traffic planning grounds and will not result in any adverse impacts on the surrounding road network or the availability of on-street parking. Further discussed in **Section 7.3** and **Appendix 4**.

In light of the assessments pertaining to Acoustics and Traffic, findings have shown that the existing operational activities on the Site carried out by Streamline Container Services do not exceed the threshold criteria pertaining to the 24/7 use of the Site, moreover, supporting suitability of the use to the precinct.



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2.6 SITE SUITABILITY

The Site is considered suitable for development as established by the previous **DA590/2018** as detailed within **Section 2.2** of this EIS. The proposal supports the functionality of the Site as a Freight Transport Facility which is consistent with the zoning of the Site under PLEP 2011 and the surrounding context.

Accordingly, the Site is considered to be suitable for the development and is consistent with the aims and objectives of the IN3 Heavy Industrial zone. The Site forms a larger IN3 heavy Industrial precinct consisting of adjoining IN3 Heavy Industrial uses including Concrete Recyclers, Waste Management Services, Sydney Metro Plan Yard, plastering suppliers. The eastern land user being Just Skip Bins was granted approval for 24-hour, 7 days a week operation approved under **DA/509/2018**. The proposed extension of operating hours sought to the existing approved development will not be out of character for the locality, including those other land uses within it. The proximity of the Site, within an industrial area and proximity to major arterial roads, serves as being ideal for freight transportation purposes.

The likely impact associated with the proposed operations are consistent with the approved land use and operations and would serve to support sustainable business development and provide support for the wider community.

Visual impact:

The Site's locality, being an establishment industrial area within close proximity of major transport infrastructure, is considered to have minimal visual impacts on the surrounding environment (even in its current form). The proposal includes additional shipping containers to be stored on the Site, which is considered consistent with the character of the area as other surrounded IN3 land uses.

Noise:

The Site's nearest identified residential receiver is one and two storey residential dwellings are located to the northeast at 27-31 Milton Street and 37-41 John Street. A noise assessment has been prepared by Acousticworks, to determine the potential noise impact of the proposed use on nearby surrounding receivers. The Acoustic Report is in response to a letter from City of Parramatta Council (dated 15/12/2020 – refer to **Appendix 6**) which states the following:

"Council is requesting a further acoustic investigation be carried out with a report provided to Council in line with the requirements of the NSW Environmental Protection Authority – Noise Policy For Industry Guide, 2017 in regards to sleep disturbance."

The relevant noise criteria for the surrounding receivers were established based upon the procedures documented in the EPA's *Noise Policy for Industry*.

Acousticworks visited the Site on 22nd July 2021 to conduct attended noise measurements of the on Site activities. The purpose of this assessment was to assess noise impacts associated with the Site to determine compliance at the nearest sensitive receivers for 24/7 operation using the criteria stated in the report issued by Acoustic Logic dated 22/02/2021.

Operational noise from the development complies with the relevant noise criteria at all receiver locations. Under normal operations, the development will generate reduced noise levels at surrounding receivers.

A copy of the Noise Impact Assessment, prepared by Acousticworks is included in **Appendix 6**. Further details of acoustic related matters are covered in **Section 7.4** of this EIS.



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Transport and Traffic:

A Traffic Impact Assessment prepared by Ason group in support of the proposal can be found at **Appendix 5**.

Road Hierarchy

The key roads providing in the vicinity of the Site are summarised below:

- James Ruse Drive - A TfNSW Classified Road (MR309) that runs in a north-south direction approximately 2 kilometres to the west of the Site. In the vicinity of the Site, James Ruse Drive carries in the order of approximately 71,000 vehicles a day in both directions.
- Grand Avenue - A local road that generally runs in an east-west direction fronting the Site. It connects to James Ruse Drive with a signalised intersection.
- Thackeray Street - A local road that generally runs in a north-south direction approximately 280 metres to the west of the Site.

Car Parking

As part of the approvals for the truck depot (DA/590/2018/A), a condition outlined that parking is to be provided as per the approved plans. The plans showed a total of 20 car parking spaces, therefore a provision of 20 car parking spaces was needed. As such, given that the number of employees has been provided by the Streamline Container Services, and that the GFA of the Site does not change as part of this proposal, the previously approved quantum of parking spaces would also be applicable for this application.

Noting that there is up to 13 staff on Site at any one time, coupled with the fact that not all staff will be single drivers, the application of the approved rates to the proposed development results in the proposal providing 24 on-site car parking spaces, indicating a surplus of 11 car parking spaces and thus satisfying and exceeding requirements.

It is noted that the additional on-site car parking spaces are provided as a requirement of the tenants to allow for flexibility in terms of on-site parking facilities and for any visitors that may arrive to Site.

RMS Guide Rates

A review of PDGP2011 refers to the RMS Guide when a land use is not defined within the DCP. In this case reference to Section 5.10.2 of the RMS Guide notes that for Container Service Facilities;

"Off-street employee parking (i.e. fleet and contract operated) as well as visitor parking, must be provided to satisfy the peak demand, as determined by surveys of similar existing developments. The location of this parking must be independent of the normal operations of the depot."

Information provided by Streamline Container Services indicates that the light vehicle parking requirements in accordance with their operational needs. In this instance, 13 spaces are required to satisfy the peak demand of the Site.

Existing Site Access

The Site is currently accessed via 4 separate driveways, each providing entry and exit points to separate parts of the Site. Each driveway permits full turning movements for cars and heavy vehicles to Grand



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Avenue and is considered suitable to accommodate the traffic generation and parking requirements as a result of the proposal. Further discussed in Section 7.3 of this EIS.



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PART C THE PROPOSAL

3.1 AIMS AND OBJECTIVES

The proposal relates precisely to a portion of Lot 2 in DP 539890 located within the Site, which was deemed unlawful as operations were outside the scope of the approved Truck Depot articulated within **DA/590/2018**. The aims of the proposal is to:

- Regulate the existing Freight Transport Facility on the Site,
- Support the efficient transportation and handling of freight in Australia
- Create job opportunities that will contribute to economic growth and development in the immediate and wider localities.
- Continue the use of a Site providing vital services to the Australian economy.

3.2 DESCRIPTION OF THE PROPOSAL

The operational activities carried out by Streamline Container Services Pty Ltd of the Site include:

- Additional storage and manoeuvring of shipping containers;
- Operational use and maintenance of heavy vehicles and associated machinery; and
- Operational use of the Site for 24 hours, 7 days a week.

It is important to note that the proposal seeks development consent to not physically modify the existing Site to cater for additional storage of shipping containers as per the scope of this proposal. Details of the proposed use and the Site are outlined in **Table 5** below.

Table 5: Proposal Particulars	
Project Element	Development Particular
Site Area	5,198 m ²
General	The proposal is considered 'designated development' pursuant to Clause 10(2) of Coastal Management SEPP.
Primary Land Use	Freight Transport Facility
Hours of Operation	24 Hour Operations 7 days a week.
Staff	13 staff
Truck movements	According to the Traffic impact Assessment prepared by Ason Group, as a result of the proposal, the Site will generate the following traffic volumes: <ul style="list-style-type: none"> ▪ 70 heavy vehicles per day; and ▪ 78 light vehicles per day.
Truck types	Multi-combination, B-double, Semi-trailers and forklifts.
Car parking	The Site in its existing state provides 24 car parking spaces. The proposal does not seek to alter the existing car parking on the Site.
Land Use Activities	The specific proposed operation activities of the partial use of the Site are further broken down to include: <ul style="list-style-type: none"> ▪ Shipping container: <ul style="list-style-type: none"> ○ Manoeuvring containers around the Site; loading containers onto trucks; unloading containers and; ○ Additional Storage on the Site. ▪ Storing and maintaining vehicles associated with the use including: <ul style="list-style-type: none"> ○ Prime movers, semi-trailers and forklifts and;



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	<ul style="list-style-type: none"> ○ Other ancillary activities associated with the use. <ul style="list-style-type: none"> ▪ Operational use of the Site for 24 hours, 7 days a week. <p>The operational activities carried out by Streamline Container Services Pty Ltd of the Site are in accordance with the Freight Transport Facility definition pursuant to PLEP20111. Furthermore, supporting the suitability of the land use activities to the IN3 precinct.</p>
Cost of works	Nil – there are no built form works proposed.

3.3 DEMOLITION AND EXCAVATION

The proposal is solely for a change of use and does not seek include any demolition or excavation of any kind.

3.4 PROPOSED BUILDINGS

The proposal does not seek development consent to construct any buildings. The only alterations to the existing Site will be the additional storage of shipping containers.

3.5 VEHICULAR ACCESS AND PARKING

Grand Avenue has unrestricted parking on the northern side fronting the Site for approximately 280 metres. Although the southern side of Grand Avenue has no parking restrictions, the lack of kerb and gutter, along with design considerations would suggest that no parking is available. There is only one entry and exit gate only 1 truck will be allowed into the premise at a time.

As part of the approvals for the truck depot (**DA/590/2018/A**), a condition outlined that parking is to be provided as per the approved plans. The plans showed a total of 20 car parking spaces, therefore a provision of 20 car parking spaces was needed. As such, given that the number of employees has been provided by Streamline container Services, and that the GFA of the Site does not change as part of this application, the previously approved quantum of parking spaces would also be applicable for this application.

Noting that there is up to 13 staff on the Site at any one time, coupled with the fact that not all staff will be single drivers, the application of the approved rates to the proposed development results in the proposal providing 24 on-site car parking spaces, indicating a surplus of 11 car parking spaces and thus satisfying and exceeding requirements.

It is noted that the additional on-site car parking spaces are provided as a requirement of the tenants to allow for flexibility in terms of on-site parking facilities and for any visitors that may arrive to Site.

Application of the parking rates indicate that the proposal can readily accommodate the anticipated parking demand, with no requirement for vehicles to parking on the public road network.

3.6 OPERATIONAL WASTE MANAGEMENT

A Waste Management Plan prepared by Streamline Container Services can be found at **Appendix 8**.

3.7 CONSIDERATION OF ALTERNATIVES

The Site is considered suitable for the proposal as it allows for the continued use of the Site for a heavy industrial purpose within an established IN3 precinct permissible with consent pursuant to PLEP2011. The use of the Site as a Freight Transport Facility with 24-hour, 7-day operations was deemed to be the most suitable for the Site for the following reasons:



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- PLEP2011 permits Freight Transport Facilities with development consent;
- Access to the regional road network is provided, namely James Ruse Drive;
- Compatibility with surrounding development and local context is achieved;
- Suitable servicing is immediately available and at no cost to the Government;
- Minimal impact on the environment would result; and,
- Implementation of suitable mitigation measures where required, can be achieved.

Assessments including Noise and Vibration, Ecological and Ecological, Traffic and Parking as well as Air Quality studies (refer to **Appendix 4, Appendix 6, Appendix 7, Appendix 9**) found the Freight Transport Facility with 24-hour, 7 day a week operation does not emit any significant adverse impacts to the surrounding area. It is therefore considered the current proposal is regarded suitable for the Site.



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PART D LEGISLATIVE AND POLICY FRAMEWORK

4.1 PLANNING FRAMEWORK

The following current and draft Commonwealth, State and Local planning controls and policies have been considered in the preparation of this application:

- **Commonwealth Planning Context**
 - *Environment Protection and Biodiversity Conservation Act 1999.*
- **State Planning Context**
 - *Environmental Planning and Assessment Act 1979*
 - *Environmental Planning and Assessment Regulation 2000*
 - *Water Management Act 2000*
 - *Protection of the Environment Operations Act 1979*
 - *Biodiversity Conservation Act 2016*
 - *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
 - *State Environmental Planning Policy No. 55 – Remediation of Land*
 - *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017*
 - *State Environmental Planning Policy (Infrastructure) 2007*
 - *State environmental Planning Policy (Coastal Management) 2018*
 - *Sydney Regional Environmental Plan (Sydney Harbour Catchment)*
- **Local Planning Context**
 - *Parramatta Local Environmental Plan 2011*
 - *Parramatta Development Control Plan 2011*
 - *City of Parramatta (Outside CBD) Development Contributions Plan 2021*

Detailed consideration of this planning framework is provided in the ensuing sections of this EIS.

4.2 ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

Under the EPBC Act 1999, any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on Matters of National Significance, it is declared a "Controlled Action" for which formal Commonwealth approval is required.

Based on preliminary investigations carried out, the Proposal does not warrant referral to the Commonwealth Minister for Environment.

4.3 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The EP&A Act is the overarching governing statute for all development in NSW and pursuant to Part 4, the type of proposed development (depending on the Capital Investment Value (CIV)), would be considered as either State, Regional or Local development. Accordingly, this DA would be submitted to Parramatta City Council and determined by the Parramatta Local Planning Panel as Designated Development.

Pursuant to Section 4.12(8), *a development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf*



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of the applicant in the form prescribed by the regulations. This EIS has been prepared in accordance with the form prescribed by the EP&A Regulation.

4.4 ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION

The *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) prescribes requirements for Environmental Impact Statements in Schedule 2. This EIS has been prepared in accordance with the form prescribed by the EP&A Regulation.

Section 4(l) of the EP&A Regulation states, that any development described in Part 1 of Schedule 3, would be declared to be designated development for the purposes of the Act.

Whilst the proposed development is not triggered as designated development by Section 4(l) of the EP&A Regulation, it does constitute designated development pursuant to Clause 10(2) of the Coastal Management SEPP – refer to **Section 4.10** for further detail.

4.5 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1979

Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).

The proposal will not involve any activity that would require the issue of an Environmental Protection Licence.

4.6 BIODIVERSITY CONSERVATION ACT 2016

The *Biodiversity Conservation Act 2016* (BC Act) is the key legislation in NSW relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to "maintain a healthy, productive and resilient environment, for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development". The BC Act is supported by a number of regulations, including the *Biodiversity Conservation Regulation 2017* (BC Regulation).

Part 7 of the BC Act provides that a proposed development may not be approved by the relevant authority if it is "likely to affect threatened species or ecological communities, or their habitats".

The Biodiversity Offsets Scheme (BOS) is intended to simplify biodiversity assessment and improve biodiversity outcomes by creating consistent assessment requirements to measure the likely biodiversity loss of development proposals and gains in biodiversity value achieved at offset Sites through active management. The BOS applies to local development (assessed under Part 4 of the EP&A Act) that is likely to significantly affect threatened species or communities or that triggers threshold levels for when assessment via the BOS is required.

The triggers for entry into the BOS are if a Part 4 development:

- Is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test of significance in Section 7.3 of the BC Act;
- Exceeds the biodiversity offsets scheme threshold according to Clause 7.1 of the NSW Biodiversity Conservation Regulation 2019 (BC Regulation), with the thresholds being:



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- The clearing of native vegetation of an area above a prescribed threshold based on the minimum lot size; or
- The clearing of native vegetation, or other prescribed action, on land included on the Biodiversity Values Map.
- Is carried out in a declared area of outstanding biodiversity value (AOBV).

The NSW Biodiversity Values Map and Threshold Tool, note the Site is not mapped on the Biodiversity Values Map (refer **Figure 3** of **Appendix 8**). Therefore, entry into the BOS is not triggered via this mechanism. Some vegetation along Parramatta River immediately to the north-east of the Site is mapped as having biodiversity values but none of this vegetation is proposed to be removed under this DA.

For the aforementioned reasons the proposed DA does not trigger entry in the BOS and a BDAR is not required. Subsequently, this Ecological Impact Assessment has been prepared to assess the impacts to biodiversity of the proposed DA.

4.7 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) repeals the former *State Environmental Planning Policy No. 11 – Traffic Generating Development* and, pursuant to Clause 104, provides for certain proposed developments known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (NSW RMS) for concurrence.

Schedule 3 of ISEPP, lists the types of development that are defined as Traffic Generating Development. The referral thresholds for 'Freight Transport Facility' includes:

- Size or capacity—site with access to a road (generally): **Any size**
- Size or capacity—site with access to classified road or to road that connects to classified road (if access within 90m of connection, measured along alignment of connecting road): **Any size**

As such, the proposal is considered Traffic Generating Development and will be referred to Transport for NSW for concurrence.

4.8 STATE ENVIRONMENTAL PLANNING POLICY (VEGETATION IN NON-RURAL AREAS) 2017

State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 aims to protect the biodiversity values of trees and other vegetation in non-rural areas, and to preserve the amenity of non-rural areas through the preservation of trees and other vegetation.

The SEPP applies to non-rural areas, meaning those zones referred to in Clause 5(1)(b). The Site is not zoned SP2 and R2, therefore the provisions of the SEPP are not applicable to this application.

4.9 STATE ENVIRONMENTAL PLANNING POLICY NO 55 - REMEDIATION OF LAND

State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55) provides a state-wide planning approach for the remediation of land and aims to promote the remediation of contaminated land to reduce the risk of harm.

Both 37A and 39 Grand Avenue are identified as being potentially contaminated in Council's records as these Sites were previously used as a chemical manufacturing company between 1940 and 1970. Consequently, **DA/433/2013** was approved on 20 December 2013 for remediation works and then the NSW EPA approved the Voluntary Management Proposal (VMP) for the Site. Council's Health Officer has also



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reviewed the proposal with respect to contamination. In response, Council's Health Officer raised no objections subject to conditions of consent.

It is also noted that this proposal will not result in any soil disturbance, accordingly, the Site is suitable for the proposed use.

4.10 STATE ENVIRONMENTAL PLANNING POLICY (COASTAL MANAGEMENT) 2018

As mentioned, the existing Truck Depot in which Streamline Container Services operate at 37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549) (the Site), was approved under **DA/509/2018**, subject to both Lot 2, DP539890 and Lot 2 DP615549. Both allotments are mapped within 'Proximity Area to Coastal Wetlands'; however, a small section of Lot 2 DP615549 (south-eastern corner) is mapped as containing 'Coastal Wetlands' pursuant to *State Environmental Planning Policy (Coastal Management) 2018* (Coastal Management SEPP) therefore the Site is affected by coastal wetland under the provisions of the Coastal Management SEPP (**Figure 6**). Clause 10 of the Coastal Management SEPP states that any development on land identified as coastal wetland is designated development. Pursuant to Part 2 of Schedule 2 of the EP&A Regulation, SEARs must be obtained from the NSW DP&E. A copy of the SEARs is included in **Appendix 2**.

Clause 10(4) of the Coastal Management SEPP relates to development carried out on land identified as coastal wetlands and littoral rainforest under the Coastal Management SEPP. The Site contains an area of land identified as coastal wetlands under the Coastal Management SEPP.

Clause 10(4) reads as follows:

A consent authority must not grant consent for development referred to in subclause (1) unless the consent authority is satisfied that sufficient measures have been, or will be, taken to protect, and where possible enhance, the biophysical, hydrological and ecological integrity of the coastal wetland or littoral rainforest.

'Coastal wetland and littoral rainforest area' is defined in the Interpretation section of the Coastal Management SEPP by reference to clause 6(2). Clause 6(2) defines 'coastal wetland and littoral rainforests area' as 'land identified as such by the Coastal Wetlands and Littoral Rainforests Area Map'. There is also a note which states 'The coastal wetlands and littoral rainforests area is made up of land identified as 'coastal wetlands' or as 'littoral rainforests' on the 'Coastal Wetlands and Littoral Rainforests Area Map.'

In this case however, the specific section of the Site in which Streamline Container Services operates shown in red in **Figure 6** is not affected by Coastal Wetlands. Notwithstanding, an Ecology Impact Statement has been prepared by Cumberland Ecology in support of the proposal and can be found at **Appendix 8**. Section A.4 of the Ecology Assessment identifies the impact assessment of the proposal.

The proposal is not expected to impact on any threatened species, ecological communities, or threatened populations listed under the BC Act of the EPBC Act, or Coastal Wetlands for the following reasons:

- Native vegetation and associated habitats have already been historically removed across the entirety of the Site, which prior to use to store shipping containers was a large, asphalted truck depot;
- There is a complete lack of habitat within the Site for any threatened species;
- The proposed DA does not propose to remove any vegetation or impact any fauna habitat as it is simply to continue operating the Site as a shipping container storage facility as it is operated currently; and
- The Site is already completely fenced with a tall chain link fence, and as such inadvertent vehicle damage to adjoining offsite vegetation is not likely, and existing sediment fencing along adjoining vegetation also prevents any sediments if spilled etc. washing off from the Site into



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Parramatta River. As the potential ecological impacts of the proposed DA will be negligible, no mitigation measures are proposed.



Figure 6: Coastal Management SEPP Map (Source: NSW DPIE – Coastal Management SEPP, 2021)

It is noted that both the Coastal Management SEPP refer to coastal wetland 'areas' as a whole, and there is no reference anywhere to Site -specific mapping. This shows that the instrument takes a broad-scale approach to coastal wetlands. This suggests that Clause 10(4) should not be interpreted in a way that is limited to just the coastal wetland on a specific Site. The broader environmental context, and preservation of the wetland system holistically, should be considered.



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4.11 SYDNEY REGIONAL ENVIRONMENTAL PLAN (SYDNEY HARBOUR CATCHMENT)

The Site is located within the designated hydrological catchment of Sydney Harbour and is subject to the provisions of the above Sydney Regional Environmental Plan (SREP) refer to **Figure 10**.

The Sydney Harbour Catchment Planning Principles must be considered and where possible achieved in the carrying out of development within the catchment. The proposed use of the Site will not cause any adverse impacts to the wetlands leaving the Site undisturbed. The proposal is deemed consistent with the controls contained within the SREP.

4.12 PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2013

The PLEP2011 is the primary environmental planning instrument (EPI) applicable to the Site. The relevant provisions are summarised below in **Figure 6**.

4.12.1 Zoning and Permissibility

PLEP2011 is the primary EPI which applies to the Site. The Site is zoned IN3 Heavy Industrial pursuant to PLEP2011 (refer to **Figure 7** below).

The relevant provisions of PLEP2011 as they relate to the Site are considered in **Table 6** below.

Table 6. IN3 Heavy Industrial Land Use Table	
Land Use Table	
Objectives of zone	<ul style="list-style-type: none"> • To provide suitable areas for those industries that need to be separated from other land uses. • To encourage employment opportunities. • To minimise any adverse effect of heavy industry on other land uses. • To support and protect industrial land for industrial uses. • To allow a wide range of industrial and heavy industrial uses serving the Greater Metropolitan Area of Sydney and beyond. • To ensure that opportunities are not lost for realising potential foreshore access on land that is contaminated and currently not suitable for public access. <p>Comment: The proposal is in relation to the existing Truck Depot on the Site, for which the proposed change of use would seek to regulate the existing Freight Transport Facility.</p> <p>The proposed use is considered compatible with its surrounds and align with the objectives of the Camellia Precinct Land use and Infrastructure Strategy while, encouraging employment opportunities with minimal adverse effects to surrounding industries. The proposal seeks to support and protect land for industrial purposes, regulating a permissible use with consent pursuant to PLEP2011.</p>
Permitted without consent	Nil.
Permitted with consent	Agricultural produce industries; Building identification signs; Business identification signs; Depots; Freight transport facilities ; General industries; Hardware and building supplies; Hazardous storage establishments; Heavy industries; Horticulture; Kiosks; Medical centres; Offensive storage establishments; Oyster



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	<i>aquaculture; Pubs; Roads; Rural supplies; Sawmill or log processing works; Take away food and drink premises; Tank-based aquaculture; Timber yards; Warehouse or distribution centres; Water storage facilities; Any other development not specified in item 2 or 4.</i>
Prohibited	<i>Agriculture; Air transport facilities; Airstrips; Amusement centres; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Centre-based child care facilities; Commercial premises; Community facilities; Eco-tourist facilities; Educational establishments; Entertainment facilities; Exhibition homes; Exhibition villages; Farm buildings; Forestry; Function centres; Health services facilities; Helipads; Highway service centres; Home-based child care; Home businesses; Home industries; Home occupations; Home occupations (sex services); Industrial retail outlets; Information and education facilities; Jetties; Marinas; Mooring pens; Moorings; Open cut mining; Pond-based aquaculture Port facilities; Registered clubs; Research stations; Residential accommodation; Respite day care centres; Rural industries; Signage; Tourist and visitor accommodation; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies.</i>

Accordingly, Freight Transport Facilities are permissible with consent in IN3 zoned land pursuant to PLEP2011.



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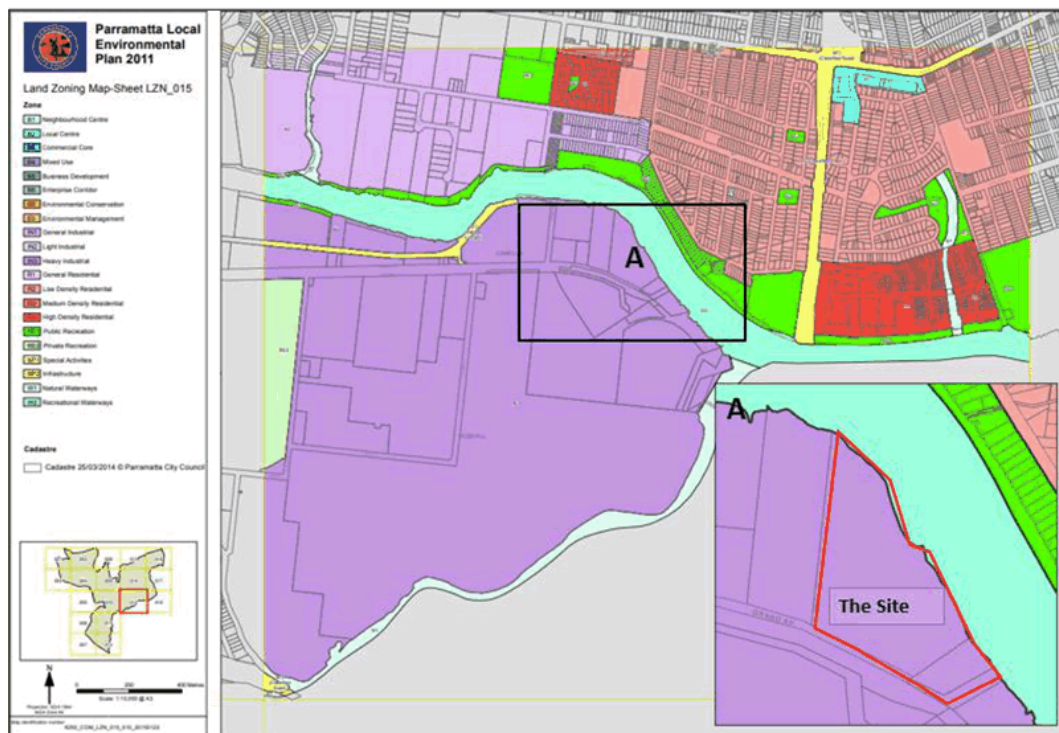


Figure 7: PLEP2011 Zoning Map (Source: NSW Legislation, 2021)

Table 7 outlines the development's consistency and compliance with the relevant development standards and controls under PLEP2011:

Table 7. Development Standards	
Clause	Comment
Clause 4.1 – Minimum Subdivision Lot Size	The Site is not identified to have a minimum subdivision lot size under PLEP2011. There is no subdivision proposed under this DA.
Clause 4.3 – Height of Buildings	The Site is subject to a split maximum building height of 12m and 9m under PLEP2011. No works are proposed which would increase the height of the built form under this DA (Figure 17).
Clause 4.4 – Floor Space Ratio	The Site is subject to a maximum FSR of 1:1 under the PLEP2011. The proposed use does not seek to increase the GFA (Figure 18).
Clause 5.10 – Heritage	Pursuant to Clause 5.10 of the PLEP 2011, a portion of the Site is mapped as containing an item of local heritage significance. Heritage Item number 15 Pumping Station is located across the portion of the Site identified as 39 Grand Avenue Camellia (Figure 19). Previous correspondence between Willowtree Planning and Parramatta City Council associated with the preparation of DA/590/2018 (Appendix 11) has confirmed that the heritage item is in



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	fact situated at 41 Grand Avenue, Camellia. It is therefore, considered a Heritage Impact Statement is <u>not</u> required to accompany this DA. Notwithstanding the above, the use of the Site as a Freight Transport Facility will have no undue impact on the heritage significance of the heritage item at 41 Grand Avenue, Camellia.
Clause 6.7 – Foreshore building line	The Site has been identified as containing land classified as being within the Foreshore Building Line pursuant to Clause 6.7 of PLEP2011, further discussed in Section 4.13 of this EIS.
Clause 7.1 – Flood Planning	The Site is not identified as flood affected land.

4.13 Clause 6.7 Foreshore Building Line – Discussion

The objectives of the Foreshore Building Line are to ensure that development area will not impact on natural foreshore processes or affect the significance and amenity of the area.

Under Clause 6.7 development consent must not be granted to development consent must be granted within the foreshore area except for the following purposes:

- (a) *The extension, alteration or rebuilding of an existing building wholly or partly in the foreshore area,*
- (b) *The erection of a building in the foreshore area, if the levels, depth or other exceptional features of the site make it appropriate to do so,*
- (c) *Development for the purposes of boat sheds, sea retaining walls, wharves, slipways, jetties, waterway access stairs, swimming pools, fences, cycleways, walking trails, picnic facilities or other recreation facilities (outdoors).*

The proposal does not include the erection or installation of any building or structure within the Foreshore Building Line and the proposed use of the Site will be contained to existing industrial premises. The proposed operations contained to the existing industrial premises which is located within proximity to the part of the Site deemed the foreshore building line. It is important to note the existing hardstand structure on the Site is not within the boundaries of the Foreshore Building Line. The Site configuration limits operations within the Foreshore Building Line, diminishing any adverse environmental effects to the natural foreshore processes or affect the significance and amenity of the area. Accordingly, the proposal is considered to satisfy the provisions of Clause 6.7. Refer to Ecological Impact Statement found at **Appendix 7** for further analysis of the minimal adverse environmental impacts as a result of the proposal.

4.14 PARRAMATTA DEVELOPMENT CONTROL PLAN 2011

The PDPC2011 is to be read and applied in conjunction with the PLEP2011. An assessment of the controls of the PDPC2011 which apply to the proposed change of use is identified in **Appendix 1**.

4.15 City of Parramatta (Outside CBD) Development Contributions Plan 2021

The proposal is subject to Section 7.11 Contributions Plan under the EP&A Act. The Site is applicable to the City of Parramatta (Outside CBD) Development Contributions Plan 2021 applies to particular land within Parramatta LGA contributions will be calculated by Council in accordance with the City of Parramatta (Outside CBD) Development Contributions Plan 2021.



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PART E STRATEGIC PLANNING FRAMEWORK

5.1 OVERVIEW OF RELEVANT STRATEGIC PLANS

The EIS has given consideration to relevant strategic plans and policies, including:

- *Greater Sydney Region Plan – A Metropolis of Three Cities*
- *Eastern City District Plan*
- *Camellia Precinct – Land Use and Infrastructure Strategy 2015*

Detailed consideration of this Strategic Planning framework is provided in the following sections.

Table 8 . ENVIRONMENTAL PLANNING LEGISLATION

Instrument	Application to proposed development
The Greater Sydney Region Plan, A Metropolis of Three (3) cities	<p><i>A Metropolis of Three Cities – Greater Sydney Region Plan</i> divides the Sydney Region into three (3) cities, with a vision of growth until 2056. The Plan aims to anticipate the housing and employment needs of a growing and vastly changing population. The overall vision pursues an objective of transforming “Greater Sydney” into a “Metropolis of Three Cities”, namely:</p> <ol style="list-style-type: none"> 1. The Western Parkland City; 2. The Central River City; and 3. The Eastern Harbour City <p>The Greater Sydney Commission’s (GSC) division of Greater Sydney into three (3) cities, aims to locate a greater proportion of the population closer to employment regions with more intensive jobs; ‘city-scale’ infrastructure & services; entertainment; and cultural facilities. By managing and retaining industrial land close to city centres and transport, the Plan aims to ensure that critical and essential services, are readily available to support local businesses and community members and residents.</p> <p>The proposal would not only support new economic growth, but would also encourage employment-generating opportunities, closer to residential communities, allowing for better access to job opportunities and a shorter commute to and from work. The proposal also contributes to the four (4) standardised elements in the Plan, across all three (3) cities, including:</p> <ul style="list-style-type: none"> ▪ External Infrastructure and Collaboration – The proposal seeks to ensure that future planned infrastructure can be accommodated to support the growth of the area and beyond. ▪ Liveability – The proposal encourages employment-generating opportunities and economic prosperity on a Site which consists of several constraints which limit the future development potential of the Site. Regulating the Freight Transport Facility would have positive impacts on the



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Table 8 . ENVIRONMENTAL PLANNING LEGISLATION

Instrument	Application to proposed development
	<p>greater Western Region, by promoting a sense of community engagement through the creation of local jobs.</p> <ul style="list-style-type: none"> ▪ Productivity – The ultimate location of the Site ensures that it can connect with the Central and Eastern City and remain competitive. It is expressly noted in the Plan, that it is essential to ensure that the cities are connected and more competitive. This competition would be facilitated unequivocally by the proposed development, through the creation of jobs and provision of space for high-tech industrial and logistics businesses. To this end, the objective of a 30-minute city can be realised under the proposed development which seeks to create jobs in proximity to where people live. ▪ Sustainability – the site has already undergone comprehensive WSUD strategy, deliver a fully-designed hydrological on-site detention system, mitigating any potential flooding impacts. <p>In summary, the proposed development would substantially contribute to the objectives set out in the <i>A Metropolis of Three Cities - Greater Sydney Region Plan</i>, by supporting employment-generating opportunities to the wider locality and community with its concentration on employment, adding to the credentials of the new, intelligent economy.</p> <p>Figure 8: A Metropolis of Three Cities: A Vision to 2056 (Source: Greater Sydney Commission: Greater Sydney Region Plan, 2018)</p>
Central City District Plan	<p>Greater Sydney's three (3) cities reach across five districts: Western City District, Central City District, Eastern City District, North District and South District. The Central City District is the central and major component of the Central River City. The Central City District is intended to grow substantially, capitalising on its location close to the geographic centre of Greater Sydney.</p>



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The Site forms part of the Central City District and is subject to the provisions of the *Central City District Plan*.

The *Central City District Plan* reinforces the planning priorities of the GSC, acting as a bridge between regional and local planning. The *Central City District Plan* informs local strategic planning statements and local environmental plans, the assessment of planning proposals as well as community strategic plans and policies. The *Central City District Plan* also assists councils to plan for and support growth and change, and align their local planning strategies to place-based outcomes.

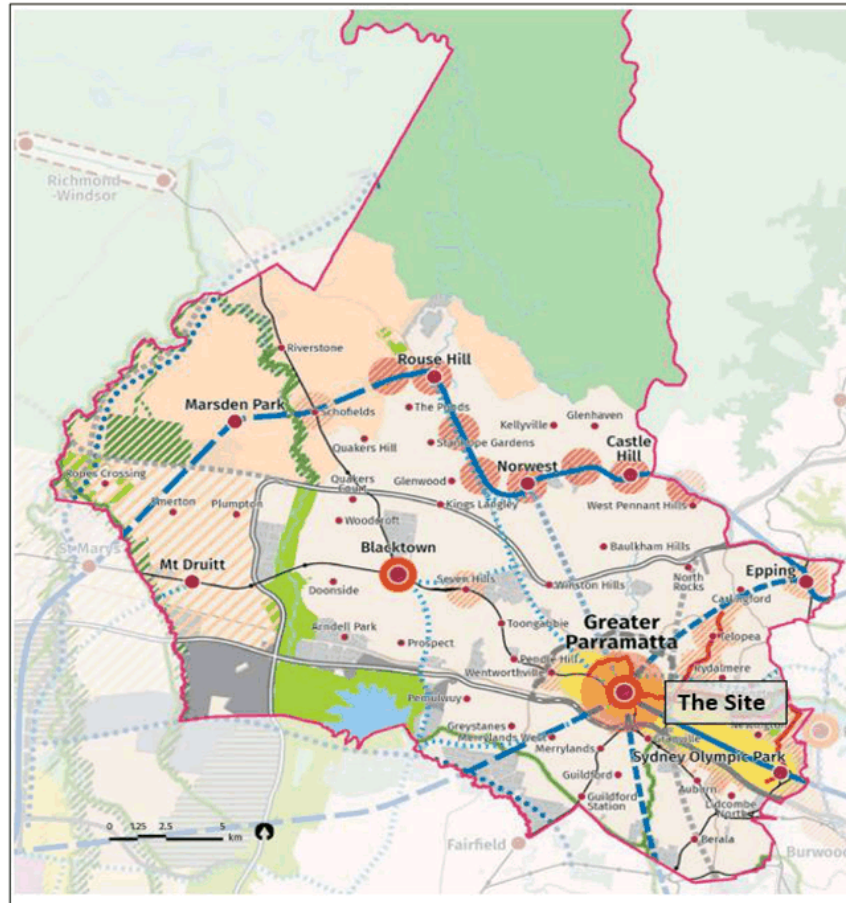


Figure 9: Structure Plan for the Central City District Plan (Source: Greater Sydney Commission, 2018)

The proposal would contribute to the objectives of the *Central City District Plan* (of which the Site forms a part), by:



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Table 8 . ENVIRONMENTAL PLANNING LEGISLATION

Instrument	Application to proposed development
	<ul style="list-style-type: none"> ▪ Supporting the efficient transportation and handling of freight in Australia ▪ Creating job opportunities that will contribute to economic growth and development in the immediate and wider localities. ▪ promoting additional employment-generating opportunities, to the wider locality and community closer to home, whilst supporting economically and environmentally sustainable development. ▪ facilitating the provision of greater and improved infrastructure; and ▪ Continuing the use of a site providing vital services to the Australian economy.
Camellia Precinct - Land Use and Infrastructure Strategic	<p>The Site is located within the suburb of Camellia forming the larger Camellia Precinct defined by Parramatta River to the north, Duck River to the east, the M4 Motorway to the south and James Ruse Drive to the west, all of which form physical boundaries to the precinct as illustrated Figure 10. The precinct is approximately 321ha and situated 1.5km east of Parramatta CBD. Characterised predominantly by industrial uses, it is home to a number of significant businesses that provide employment across a range of industries. The Camellia Precinct is subject to Camellia Precinct - Land Use and Infrastructure Strategy 2015, the Precinct Planning Principles are as follows:</p> <ol style="list-style-type: none"> 1. Increase job density by supporting a variety of employment opportunities across the precinct. 2. Allow for some mixed-use development, including residential, in the north-western quadrant of the precinct, concentrated around the future Western Sydney Light Rail alignments and with primary access from James Ruse Drive and Grand Avenue. 3. Create an industry-leading entertainment precinct at Rosehill Racecourse, which can serve as a buffer between the mixed use and industrial uses within the precinct. 4. Retain the majority of the southern and eastern part of the precinct for industrial uses, but facilitate its transition to more contemporary industries including clean technologies, eco- industries, advanced manufacturing and logistics. 5. Provide an integrated transition zone in the northern part of the precinct along the Parramatta River adjacent to Grand Avenue, allowing for a complementary transition of land uses between the mixed-use precinct to the west and industrial precinct in the east. 6. Provide for vehicular connections between Camellia, Silverwater, Rydalmere and the M4 to mitigate heavy vehicle movements through mixed use development. 7. Improve access to public transport in the precinct by focusing new development around transport nodes.



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Table 8 . ENVIRONMENTAL PLANNING LEGISLATION

Instrument	Application to proposed development
	<p>8. Create a network of public open spaces to improve active transport connectivity to, through and within the precinct.</p> <p>9. Investigate opportunities for additional public facilities and infrastructure to support the expected demand for services at Camellia.</p> <p>10. Establish design guidelines to deliver high quality urban environments within Camellia that result in enhanced amenity for residents, workers and visitors alike.</p>
	<p>Figure 10: Site Area Locality and land use Character (DIPE, 2015).</p> <p>The Proposal is considered entirely consistent with and responsive to the above priorities, continuing a valuable contribution to the Heavy Industrial section within the Camellia Precinct. Regulating the existing Freight Transport Facility with 24-hour operations on the Site maximises job opportunities in an industry playing a vital role in the efficient transportation and handling of freight in Australia. In turn, contributing to economic growth and development in the immediate and wider localities of Sydney.</p>



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PART F CONSULTATION

6.1 OVERVIEW

An application to receive SEARs was submitted to NSW DPIE. The SEARs (Reference No. 1605) were subsequently issued on 3 September 2021.

A copy of the issued SEARs is included in **Appendix 2**.

An overview of how the requirements have been satisfied are included in **Table 3**. This EIS document is also consistent with the minimum requirements for an EIS, pursuant to Clause 6 and 7 of Schedule 2 of the EP&A Regulation.

Table 3 in the Executive Summary of this EIS lists the stakeholders which were required to be consulted with as per the SEARs issued by the NSW DPIE on 7 May 2019. These include

- Department of Planning, Industry and Environment, specifically the: Water Group;
- Transport for NSW;
- Deerubbin Local Aboriginal Land Council;
- City of Parramatta Council;
- The surrounding landowners and occupiers that are likely to be impacted by the proposal.

An overview of how the requirements have also been satisfied within the EIS is outlined further within **Table 9** below. This document is also consistent with the minimum requirements for an EIS pursuant to Clauses 6 & 7 of Schedule 2 under the EP&A Regulation 2000.

There were no responses from the stakeholder consultation listed up during the preparation of this EIS.

6.2 Agency Consultation

In preparation of this DA, the relevant State Agencies (including Parramatta City Council) were liaised with to inform them of the Proposed Development. Agency consultation undertaken to date includes (but is not limited to) those detailed in **Table 9** below.

Table 9: Agency Consultation Records	
Stakeholder	Consultation Notes
NSW DPIE - Water Group	Consultation letter sent 16 September 2021, no response was received regarding the consultation letter.
Parramatta City Council	Consultation letter sent 16 September 2021, no response was received regarding the consultation letter.
Transport for NSW	Consultation letter sent 16 September 2021, no response was received regarding the consultation letter.
Deerubbin Local Aboriginal Land Council.	Consultation letter sent 16 September 2021, no response was received regarding the consultation letter.



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PART C ENVIRONMENTAL RISK ASSESSMENT

7.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENT

The SEARs (Reference No. 1605) issued by the NSW DPIE on 3 September 2021 identify the following key issues:

- Noise and Vibration
- Suitability of the Site
- Traffic and Transport
- Biodiversity
- Waste Management
- Soil and Water
- Air Quality
- Heritage

The abovementioned matter(s), and other necessary matters, are addressed in the following section(s).

7.2 ENVIRONMENTAL AMENITY

As discussed in **Section 2.5.1** of this EIS, the reasoning behind the preparation of a DA, is to regulate the existing Freight Transport Facility which was operating outside the conditions of the subject Consent **DA/590/2018**. The unlawful operations consisted of additional storage of shipping containers, 24-hour, 7 days a week activity and the extent of vehicular and container movements around the premises, far exceeding the purpose for which consent was granted. Consequently, these unlawful operations led to detrimental impacts upon the health and wellbeing of resident neighbours to the north of the Site.

In accordance with the SEARs and requirements depicted in Council's Unlawful Use Letter dated 2 June 2021, the following subsections demonstrate the suitability of the Freight Transport Facility activities to the Site.

7.3 TRAFFIC AND TRANSPORT

A Traffic Statement was prepared by Ason Group dated 16 September 2021 assessing the suitability of the Site to accommodate a Freight Transport Facility, raise any potential impacts as well as other traffic and transport related issues including access to and from the site, public and active transport accessibility and car parking requirements.

7.3.1 EXISTING CONDITIONS

Site Access

The site is currently accessed via four (4) separate driveways, each providing entry and exit points to separate parts of the Site. Each driveway permits full turning movements for cars and heavy vehicles to Grand Avenue in **Figure 11**.

The key roads providing in the vicinity of the Site are summarised below:

- James Ruse Drive - A TfNSW Classified Road (MR309) that runs in a north-south direction approximately 2 kilometres to the west of the Site. In the vicinity of the Site, James Ruse Drive carries in the order of approximately 71,000 vehicles a day in both directions.
- Grand Avenue - A local road that generally runs in an east-west direction fronting the Site. It connects to James Ruse Drive with a signalised intersection.



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- Thackeray Street – A local road that generally runs in a north-south direction approximately 280 metres to the west of the Site.



Figure 11: vehicular access to and from the Site (Ason Group, 2021)



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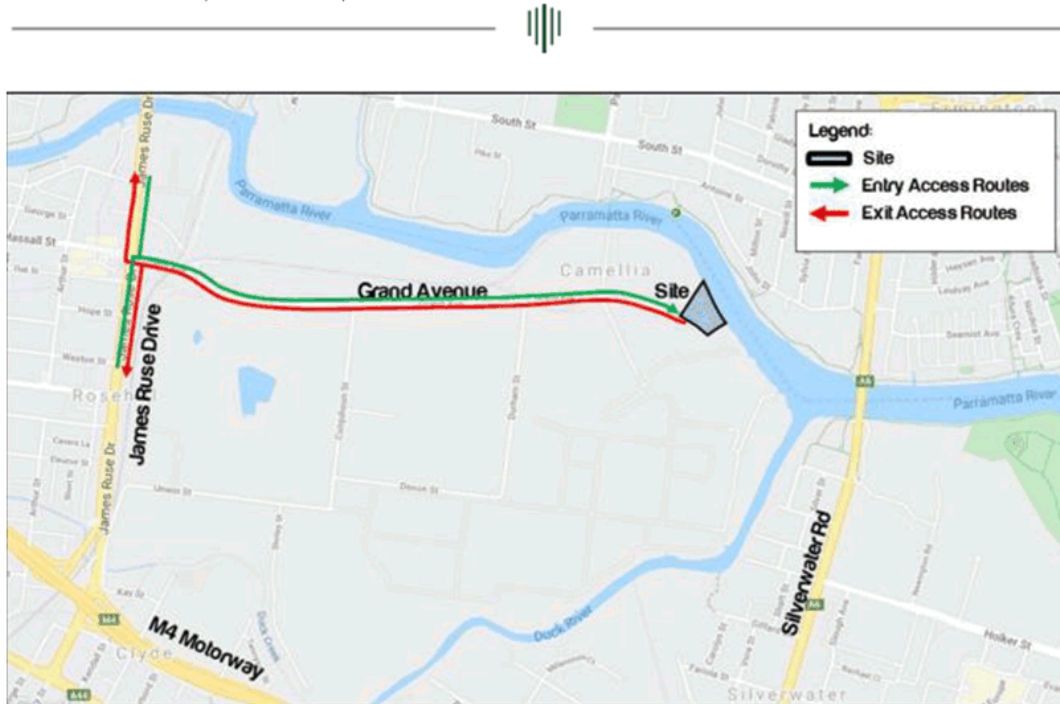


Figure 12: vehicular access to and from Grand Avenue (Ason Group, 2021)

7.3.2 Traffic Generations

Previously, the approved bus depot (ref: **DA/986/2017**) generated in the order of 120 light vehicle movements and 120 heavy vehicle movements per day. Subsequently, the approved truck depot (ref: DA/590/2018/A) had approval for 20 heavy vehicle movements per day. Both had approval for 24 hour, 7-days a week operation.

This DA does not seek approval to alter the GFA, nor are there any fundamental impacts to staff numbers or traffic generation proposed against either of the previous approvals noted above. In relation to this proposal, light vehicle movements are primarily influenced by staff vehicle movements with shift changes. Furthermore, there could be a further increase in light vehicle trip generation from employees leaving during lunch and for 'other errands'. Therefore, noting that a maximum of 13 staff currently work at any one time, assuming 1 shift change over in a 24-hour period plus visitors and ancillary trips, a total yield of 39 vehicles, or 78 light vehicle movements would be sufficient to capture all trips. Operating information received by the client proposes that the Site will have a heavy vehicle traffic generation of 35 vehicles, or 70 movements per day.

Again, this generation is spread over a 24-hour period and not representative of peak periods. Although the trip generation exceeds those approved within the truck depot, the proposed trip rates are greatly reduced from against those approved within the bus depot. Noting that the there is no change in GFA, the approval. **Table 10** highlights the bus depot approved and current operational traffic generation numbers over a 24-hour period.

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	DA/986/2017 Approval	Proposed	Difference
Light Vehicle Movements	120	78	-42
Heavy Vehicle Movements	120	70	-50
TOTAL	240	148	-92

Note: 1 Vehicle = 1 in movement + 1 exit movement = 2 movements

Table 10: Traffic Generation Comparison (Ason Group, 2021)

7.4 NOISE AND VIBRATION

Acoustic Works have undertaken a Noise Impact Assessment to assess the suitability of the Site for the Freight Transport Facility operating with 24 hour, 7 days a week activity. Details of the Assessment are included in the following sections. The complete Noise Impact Statement can be viewed in **Appendix 6** of this EIS.

Nearest Receptors

The nearest noise sensitive receiver locations were identified as follows;

- One and two storey residential dwellings are located to the northeast at 27-31 Milton Street and 37-41 John Street.

Figure 14 demonstrates the location of the Site and the surrounding receiver.

For the purpose of Acousticworks have applied a worst-case scenario noise impact prediction (with all equipment operating on Site) to ensure all operational conditions comply with the relevant criteria.

A review of the predicted noise levels at surrounding receiver, with all equipment and vehicles operating, indicate compliance with Site -specific noise criteria at the receiver, including the night-time operation. Refer **Figure 13** and **Section 4** of the Noise Impact Assessment for further discussion (**Appendix 6**).



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Description	Measured source noise levels			Measured receiver noise levels			Night Criteria		Component Level (Leq T dBA)	Night criteria Complies (yes/no)
	L _{Aeq,T} dBA	L _{Amax} dBA	Distance	L _{Aeq,T} dBA	L _{Amax} dBA	Distance	L _{Aeq,T} dBA	L _{Afmax} dBA		
Container movements	70	83	20m	44	51	~220m	43	53	34	yes
Container loading onto truck	71	82	20m	46	53	~220m	43	53	41	yes
2 trucks, container forklift movements, container drop	71	85	20m	47	57	~220m	43	53	43	yes
Container forklift and truck movements	72	85	20m	46	52	~220m	43	53	41	yes
Unloading truck, placing container	71	86	26m	46	53	~220m	43	53	41	yes
Truck arrivals and departures	73	83	26m	45	52	~220m	43	53	35	yes
Background measurement	46	-	-	45	-	-	-	-	-	-

Figure 13: Measured noise levels (Source: Acousticworks, 2021)

Simultaneous attended measurements were conducted on the 22nd of July 2021 at the measurement locations shown in **Figure 14** to determine the noise impacts associated with the onsite activities. All noise measurements were conducted generally in accordance with Australian Standard AS1055 'Acoustics – Description & Measurement of Environmental Noise'.



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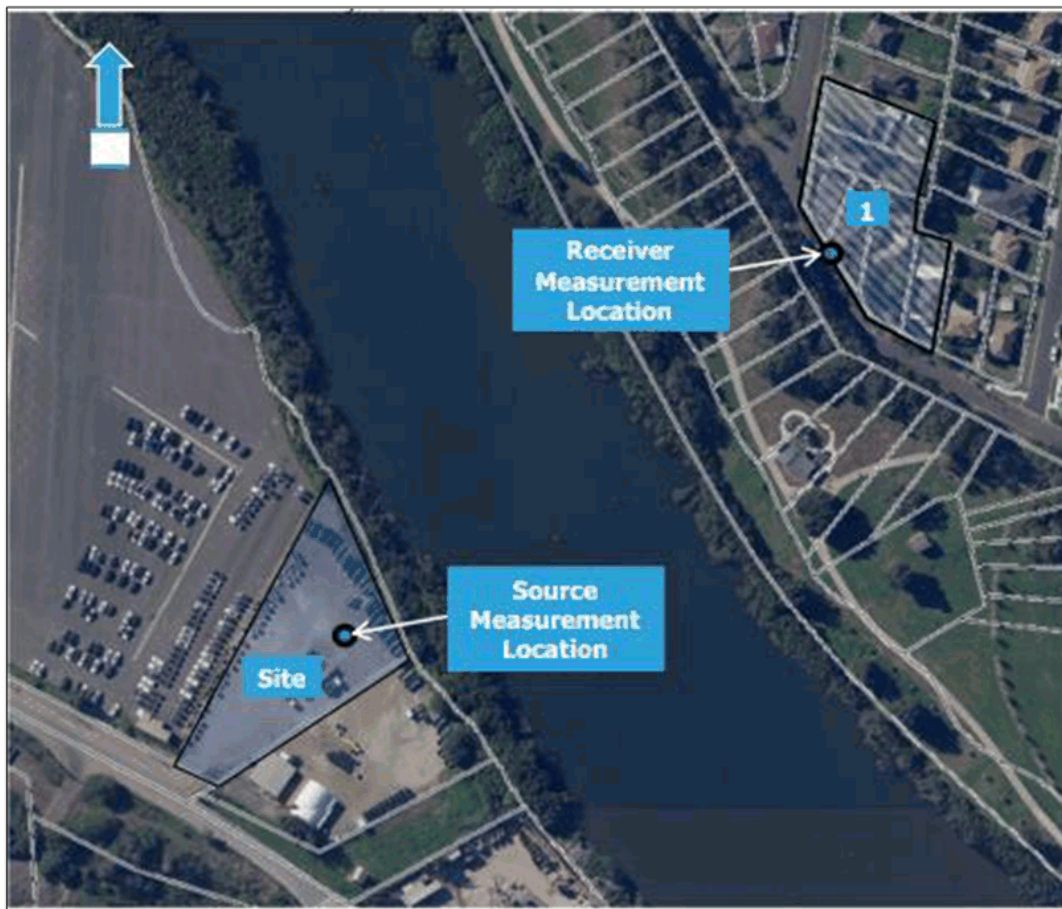


Figure 14: Receiver and condenser locations (Source: Acousticworks, 2021)

At the completion of the Noise Impact Assessment, Acousticworks recommended the following to ensure compliance at the nearest Noise Sensitive Receiver is maintained:

- Staff should avoid dropping containers at all times. Storage containers shall be carefully placed when relocating including for loading and unloading of trucks.
- Trucks are to drive to the designated loading/unloading zone and shall depart as soon as possible. No additional truck movements are to be conducted on Site.
- Work shall be minimised on the waterfront area of the Site during the night-time period.

7.5 BIODIVERSITY

A field survey was carried out by Cumberland Ecology, to verify the presence of native vegetation, threatened ecological communities, assessment of the Coastal Management SEPP mapping and the potential threatened species habitat. The results are described in the following sections. There is no requirement for a Biodiversity Development Assessment Report (BDAR) to be completed to accompany this EIS in support of the Designated Development Application.



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7.6.1 Vegetation on Site

No native vegetation communities are mapped within the Site by the Native Vegetation of the Sydney Metropolitan Area mapping project (OEH 2016) – the most recent broad-scale vegetation mapping covering the locality. The nearest native vegetation mapped to the Site is the community Estuarine Mangrove Forest, which is mapped along the banks of the Parramatta River to the north. It is important to note, no clearing of vegetation is proposed under this DA.

7.6.2 Impacts on threaten species

Cumberland Ecology has concluded that there is a complete lack of habitat within the Site for any threatened species. Assessments of the likelihood of occurrence of threatened flora and fauna species which have previously been recorded within the locality are provide in Table 2 and Table 3 in **Appendix B** of the Ecology Report found in **Appendix 7**.

7.6.3 Measured to avoid, minimise and/or offset biodiversity impacts

As the potential ecological impacts of the proposed DA will be negligible, no mitigation measures are proposed.

7.6 WASTE

Details of the construction and operational waste are provided within the *Waste Management Plan* prepared by Streamline Container Services and found be found at **Appendix 8**. Recyclable and non-recyclable materials generated during operation would be collected and disposed of by a licensed contractor. The ongoing management of waste would be promoted through the following:

- *Staff awareness and educational programs would be run which would supplement existing OH&S, and environmental programs on waste management;*
- *The recycle and waste areas would be clearly marked and bins suitably labelled; and,*
- *Cleaning staff would be responsible for day-to-day management and control of all waste and recycling stations.*

7.7 HERITAGE

As mentioned in Section 4.12, Heritage Item number 15 Pumping Station is located across the portion of the Site identified as 39 Grand Avenue Camellia (**Figure 17**). Previous correspondence between Willowtree Planning and Parramatta City Council associated with the preparation of DA/590/2018 has confirmed that the heritage item is in fact situated at 41 Grand Avenue, Camellia. It is therefore, considered a Heritage Impact Statement is not required to accompany this DA. This correspondence can be found at **Appendix 11**.

Notwithstanding the above, the use of the Site as a Freight Transport Facility will have no undue impact on the heritage significance of the heritage item at 41 Grand Avenue, Camellia.

7.7.1 Aboriginal Heritage

The Site is not environmentally constrained by any identified Aboriginal Cultural Heritage and / or Historic Heritage items, nor are any heritage items of significance located in close proximity of the Site, which require further consideration.

7.8 SOIL AND WATER



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7.8.1 Stormwater Management

The proposal is solely for a change of use of the Site to regulate a Freight Transport Facility. Moreover, no physical works will be undertaken on the Site. The existing stormwater management system (approved under **DA590/2018**) which is consistent with good management practices will be maintained on the Site achieving the targeted requirements concerning Council's flooding and Water Sensitive Urban Design (WSUD) principles and objectives.

7.8.2 Contamination

The site is identified as contaminated and DA/433/2013, as amended, was approved for remediation and demolition on 6 January 2014. The development consent was granted in accordance with the required remediation works to be completed by the NSW Environment Protection Authority (EPA) Approved Voluntary Management Proposal (VMP) No. 20121719 for the Site. A search of the List of NSW Contaminated Sites Notified to EPA as of 02 July 2018 returned the result that the 'contamination is currently regulated under CLM Act'. It is considered that the land is suitable in its contaminated state, following the remediation works approved under DA/433/2013, for the proposed use and further, no earthworks are proposed. Accordingly, no further investigation is required as part of this DA.

7.9 AIR QUALITY

An Air Quality Impact Assessment (AQIA) has been prepared by Northstar Air Quality in support of this DA which can be found at **Appendix 9**. The AQIA summarises and characterises the existing environmental conditions and identifies the potential emissions to air associated with the proposed operation on the Site. It examines the potential for off-site impacts and identifies appropriate mitigation measures that would be required to reduce those potential impacts, addressing all requirements outlined in the SEARs dated 3 September 2021.

The following activities are anticipated to result in potential emissions to air:

- Movement of vehicles around the internal roadways of the Site on paved and unpaved road surfaces; and
- Diesel combustion emissions from the consumption of diesel fuel, in truck movements importing and exporting containers. The potential emissions would include particulate matter (as PM₁₀ and PM_{2.5}) and oxides of nitrogen (NO_x), including nitrogen dioxide (NO₂).

Source	Particulate Emissions			Gaseous Emissions
	TSP	PM ₁₀	PM _{2.5}	NO _x
Wheel generated emissions – trucks	✓	✓	✓	
Exhaust emissions – truck engine	✓	✓ ⁽¹⁾	✓	✓

Figure 15: Identified potential sources of air emissions (Source: Northstar, 2021)

Given the nature of the proposal at the Site, it is not anticipated that odour would be emitted in any significant quantity during operation and is not considered further within this AQIA.

Section 7.1 of the Air Quality Assessment (**Appendix 9**) identifies and discusses the mitigation and monitoring measures to be implemented to ensure that exceedances of the adopted air quality criteria



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would not be experienced as a result of the operation at the relevant receptor receivers. Summary of the mitigation measures are identified in **Figure 16**.

Emission control method	Control efficiency (%)
Application of water on haulage routes (internal)	75
Reduction in vehicle speeds below 40 km·hr ⁻¹ on unpaved roads	85
Reduction in vehicle speeds below 40 km·hr ⁻¹ on paved roads (hardstand)	44

Figure 16: Summary of emission reduction as part of Site operation (Source: Northstar, 2021)

The predictions identified and discussed in the AQIA indicate that there would be a low risk of any additional exceedances of the adopted air quality criteria as a result of the 24-hour operations on the Site to nearby residential locations.

It is considered that no air quality monitoring would be required to be performed, although it is recommended that regular audits are undertaken ensuring air quality control measures are continually implemented.

To conclude, the results of the Air Quality Assessment indicate that the impacts of the proposal are predicted to be minor at all surrounding receptor locations. Addition of existing background air quality concentrations results in no additional exceedances of the air quality criteria being experienced at any residential receptor, or industrial receptor where those criteria should be applicable.

PART H PROPOSED DEVELOPMENT JUSTIFICATION



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Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia Lot 2, DP539890 and Lot 2 DP615549



8.1 Justification

The proposed change of use is justified on environmental, social and economic values and is compatible with the locality in which it is proposed. Regulating the Freight Transport Facility on the Site would support the efficient transportation and handling of freight in Australia creating job opportunities that will contribute to economic growth and development in the immediate and wider localities on a Site which contains various constraints.

8.1.1 Supports State, Regional and Local Planning Objectives

The proposed use is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan and Camellia Precinct – Land Use and Infrastructure* and the PLEP2011 Objectives. The proposal would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

8.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The Heavy Industrial Sector is an important economic driver and job generator for Sydney as a region. The proposal would be a highly appropriate and compatible response to the strategic goals and objectives of the whole region as set out in *A Metropolis of Three Cities – Greater Sydney Region Plan, Central City District Plan and Camellia Precinct Land Use and Infrastructure Strategy 2015*.

8.1.3 Minimise Environmental Impacts

Specialist consultants (as identified in **Table 1**) have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports (as listed in **Table 1**) have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully developed strategies are set out in detail for mitigation. These measures are described in **Part H** of this EIS.

8.1.4 Creates Compatibility with Surrounding Development

The proposal has been assessed to be compatible with existing land uses on adjacent land, all of which provide very similar employment-generating functions. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur.

8.1.5 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air-quality, noise, waste and pollution impacts, through avoidance and management.



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Change of Use from a Truck Depot to a Freight Transport Facility
37A-39 Grand Avenue, Camellia Lot 2, DP539890 and Lot 2 DP615549



PART I CONCLUSION

This proposal is deemed to be 'designated development' under Clause 10 of the Coastal Management SEPP and has been prepared in accordance with the SEARs.

The proposed development is considered to be entirely consistent with the Objects of the EP&A Act under Section 1.3, particularly the notion of promoting the orderly and economic development of the land. The proposed development is considered a quality outcome for a unique industrial Site with several constraints, which forms part of the Parramatta LGA. Additionally, in the promotion of employment-generating opportunities throughout the construction and operational phases, the proposed development further delivers on the rationale of full economic utilisation and proper and orderly development of the land for its intended purpose namely industrial and employment uses.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

1. **Strategic and Statutory Context** – The proposal aligns with the strategic planning framework, namely *A Metropolis of Three Cities*, *Central City District Plan* and *Camellia Land use and Infrastructure Strategy 2015*. Consistency is achieved through the provision of employment, activation of stagnant industrial land and implementation of sustainable development measures that contribute to continuing leading-edge form of development.

In terms of the statutory context, the proposal is entirely consistent with the Objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with IN3 zoned land pursuant to PLEP2011 in that it achieves the employment generating outcomes envisaged for the Site with minimal impact on surrounding land uses.

2. **Suitability of the Site** – The Site is highly suitable for a Freight Transport Facility as it has already been used for industrial purposes. It also presents a suitable platform for development in that it is relatively flat, is located within close proximity of key road infrastructure and it has limited environmental constraints.
3. **Community and Stakeholder Engagement** – This EIS and supporting reports have been prepared in accordance with the matters discussed with Parramatta City Council.
4. **Traffic and Transport** – Sufficient access and parking arrangements are provided as part of the proposed development, ensuring that there would be no undue impact on the surrounding road network.
5. **Soils and Water** – The existing stormwater management system (approved under **DA590/2018**) which is consistent with good management practices will be maintained on the Site achieving the targeted requirements concerning Council's flooding and Water Sensitive Urban Design (WSUD) principles and objectives.
6. **Biodiversity** – There is no requirement for a Biodiversity Development Assessment Report (BDAR) to be completed to accompany this EIS in support of the Designated Development Application. No native vegetation communities are mapped within the Site by the Native Vegetation of the Sydney Metropolitan Area mapping project (OEH 2016) – the most recent broad-scale vegetation mapping covering the locality. As the potential ecological impacts of the proposed DA will be negligible, no mitigation measures are proposed.
7. **Heritage** – The Site is not environmentally constrained by any identified Aboriginal Cultural Heritage and / or Historic Heritage items, nor are any heritage items of significance located in close proximity of the Site, which require further consideration.



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Change of Use from a Truck Depot to a Freight Transport Facility
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8. **Noise** – Noise monitoring carried out (attended and unattended) indicates that the proposed development can successfully co-exist with all surrounding land uses. Acousticworks have determined that the proposed facility would not adversely impact on the nearby surrounding receivers.
9. **Hazards and Risks** – The proposed development does not seek to store dangerous goods, therefore SEPP 33 is not triggered. The future uses of the facility do not warrant further consideration in this respect under this application.
10. **Waste** – A Waste Management Plan has been provided, which considers operational waste measures to be undertaken for the proposed use. All buildings have considered the provision for waste management areas to ensure the effective management and disposal of waste can occur.
11. **Air Quality** – It is considered that no air quality monitoring would be required to be performed, although it is recommended that regular audits are undertaken ensuring air quality control measures are continually implemented.
12. **Economic Impacts** – Conclusions drawn from this EIS, indicate that the proposed development will continue economic growth due to the provision of substantial employment generating opportunities during the construction and operational phases.

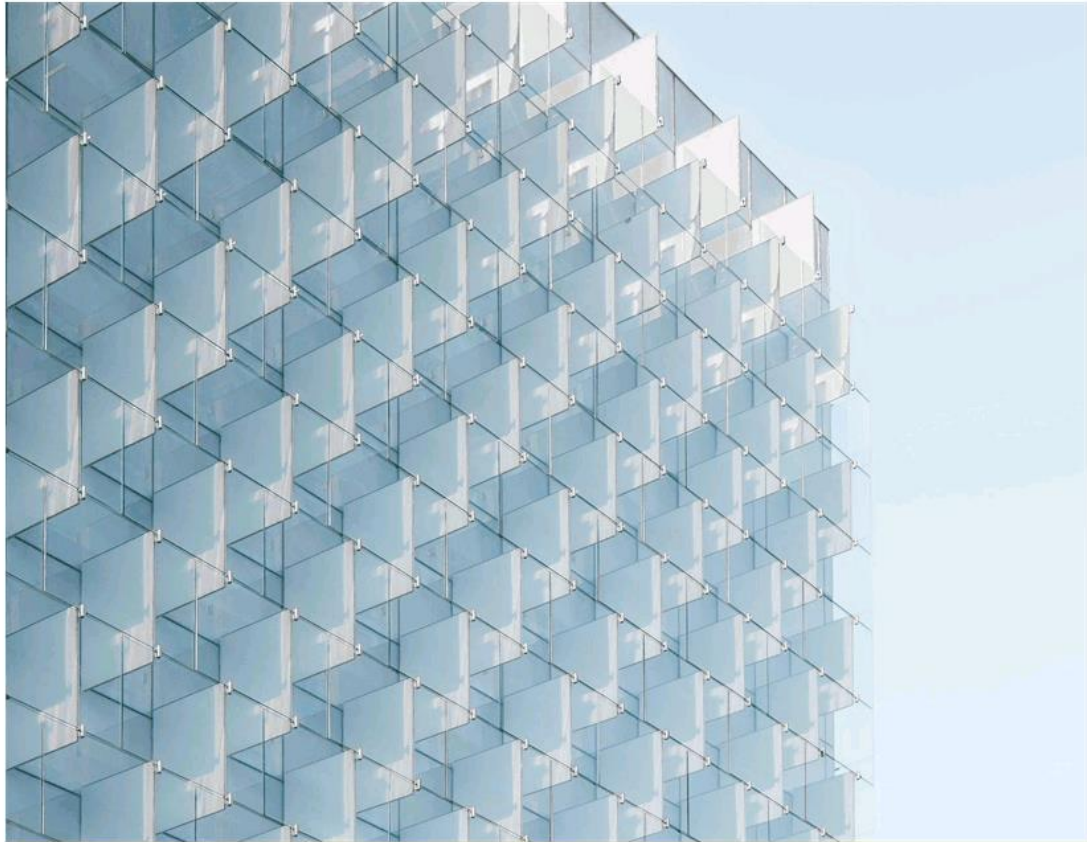
Based on the findings of this EIS, it is concluded that the proposed development would support the continued and targeted heavy industrial operations in the Sydney Region. The proposal would contribute to the retention and growth of freight logistics operations, across both NSW and Australia. The proposed development is therefore considered suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Given the above reasons and the satisfaction of the Objects of the EP&A Act, the aims of PLEP2011, and Clause 10 of the Coastal Management SEPP, it is recommended that the regulating the existing Freight Transport Facility, be supported subject to relevant and reasonable conditions.



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

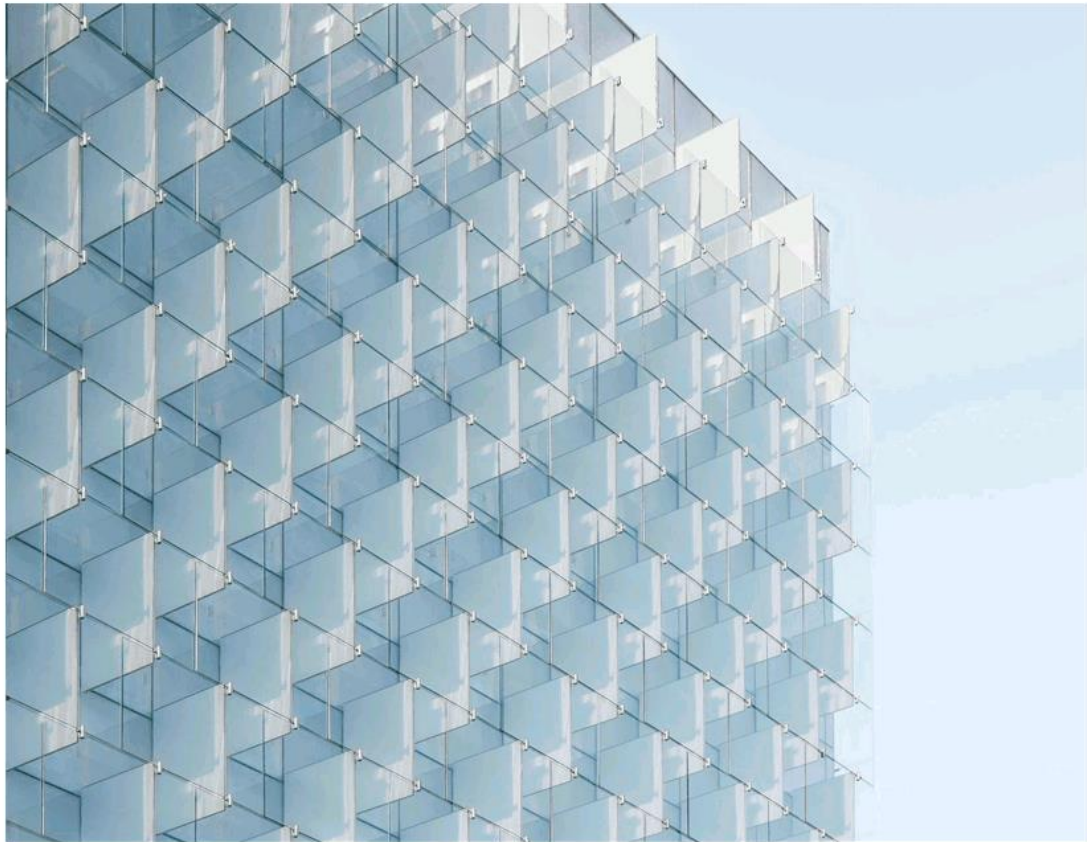


APPENDIX 1
DCP Compliance Table



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

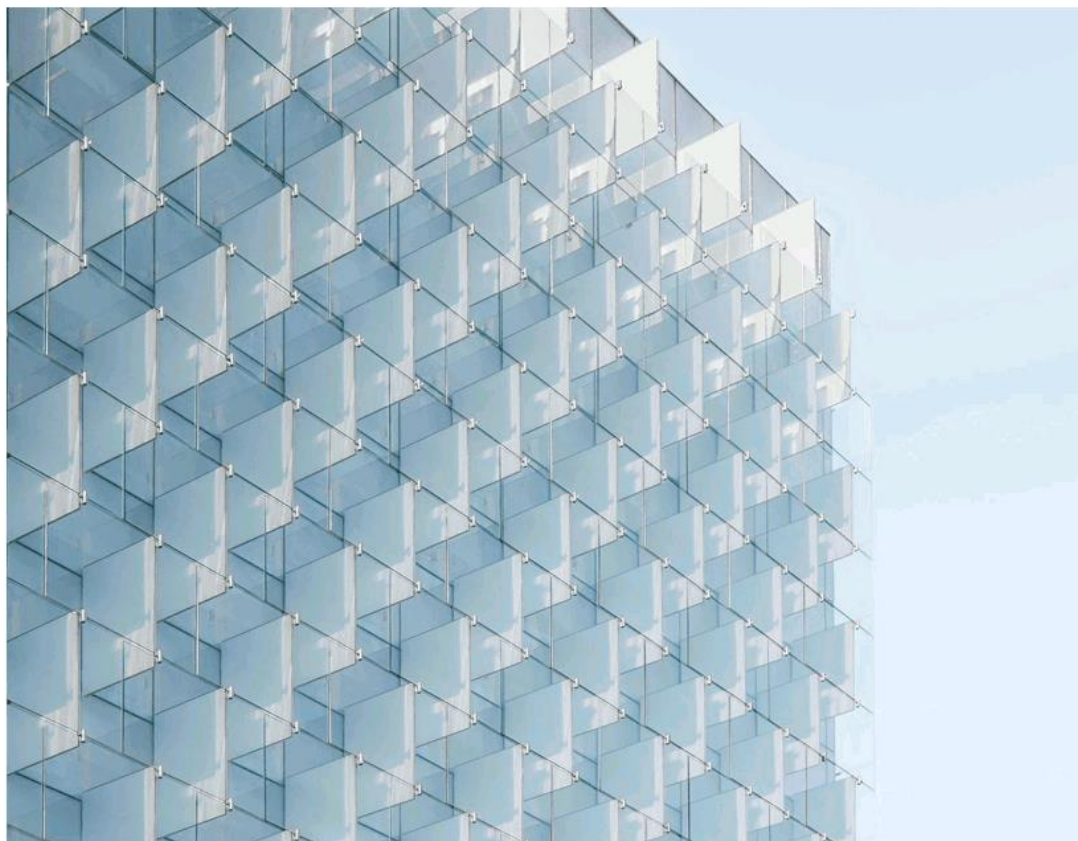


APPENDIX 2
Parramatta Development Control Table



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

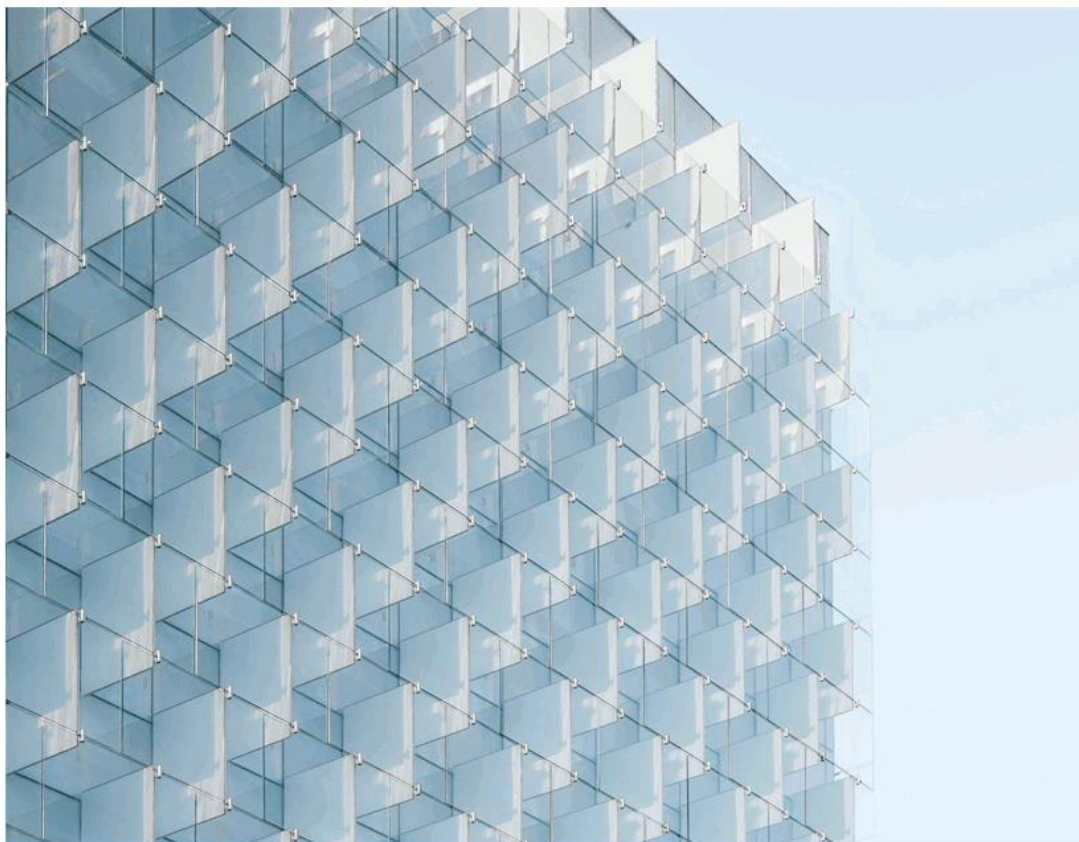


APPENDIX 3
Architectural (Site Plan)



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

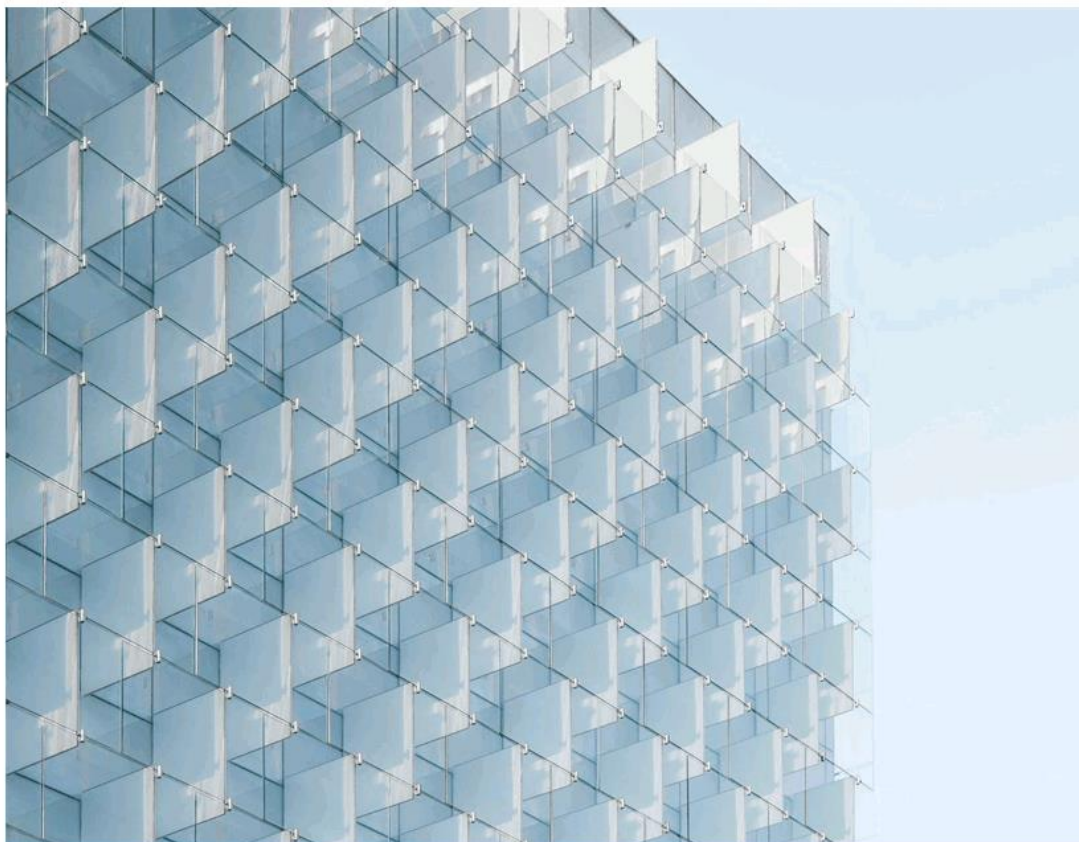


APPENDIX 4
Traffic Report



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

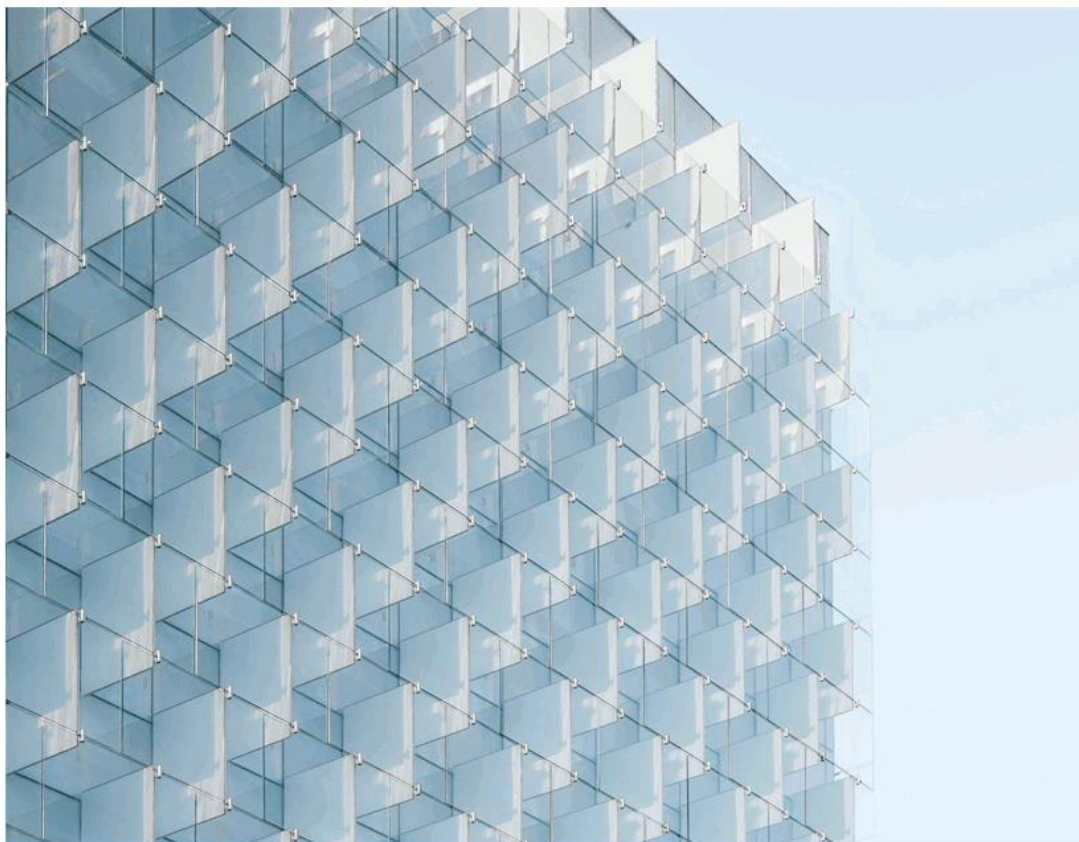


APPENDIX 6
Plan of Management



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

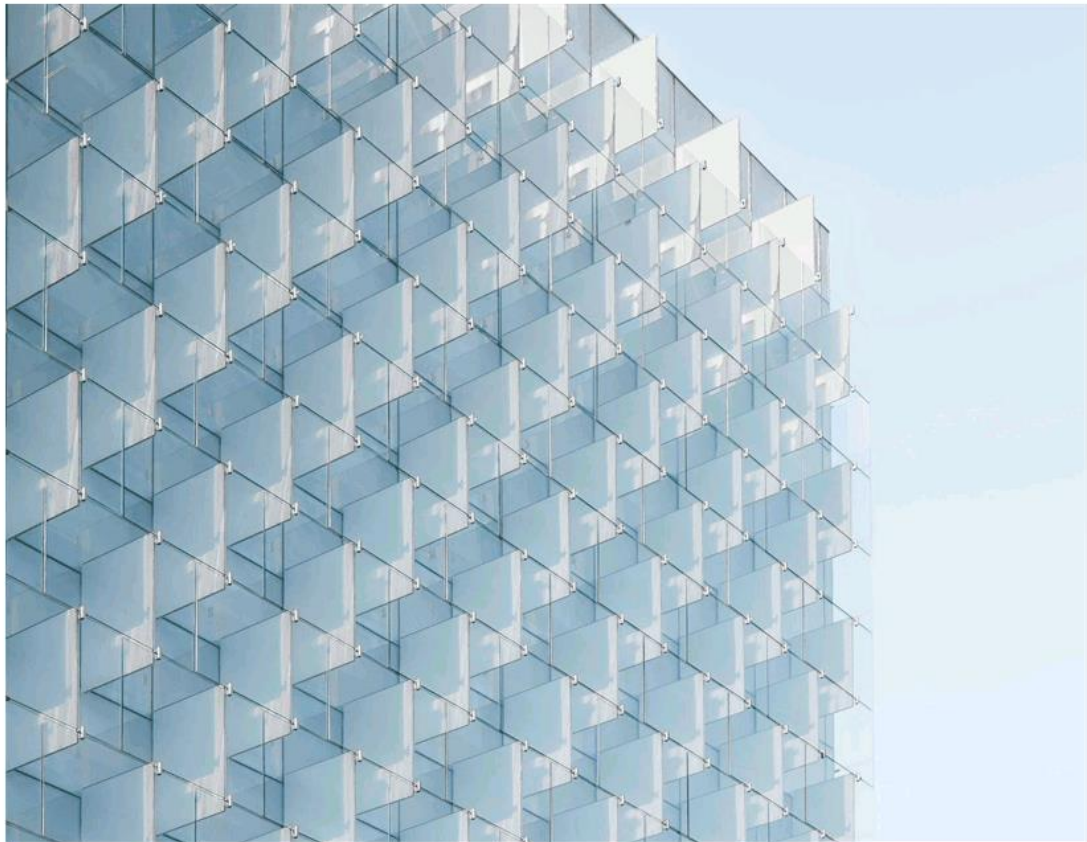


APPENDIX 6
Noise



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

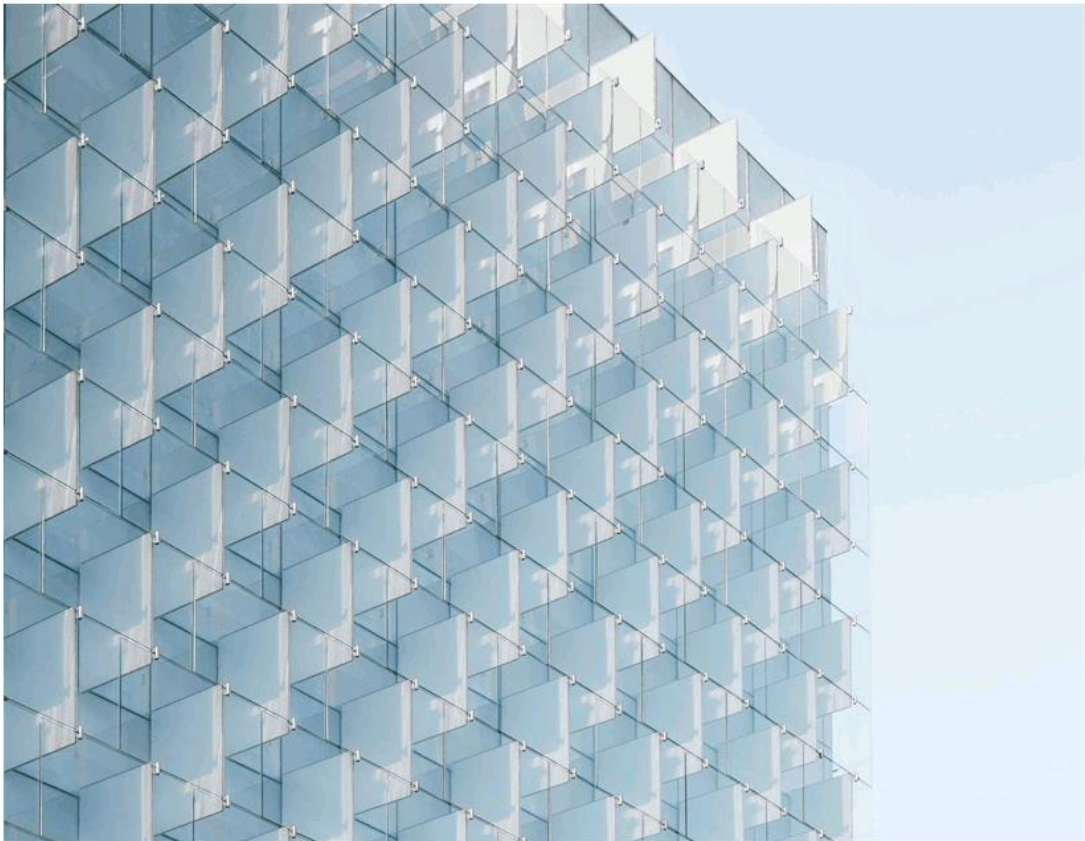


APPENDIX 7
Biodiversity/Ecological Assessment



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

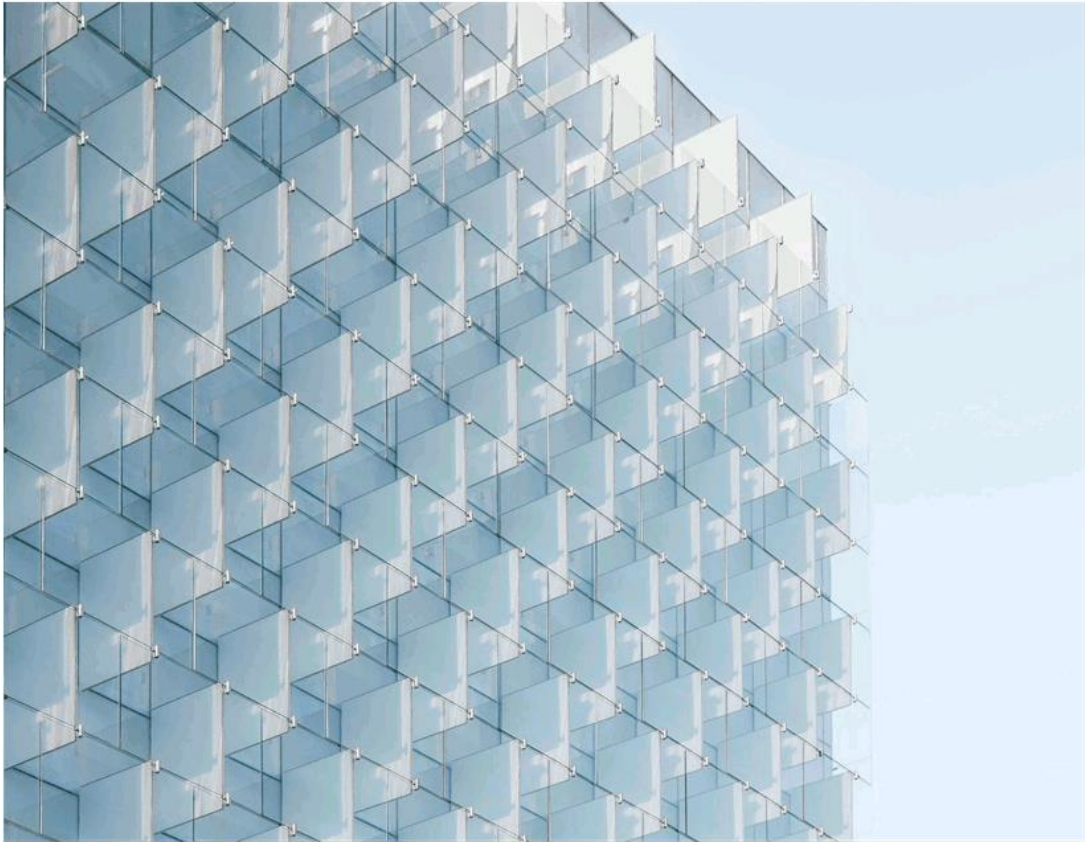


APPENDIX 8
Waste Management Plan



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

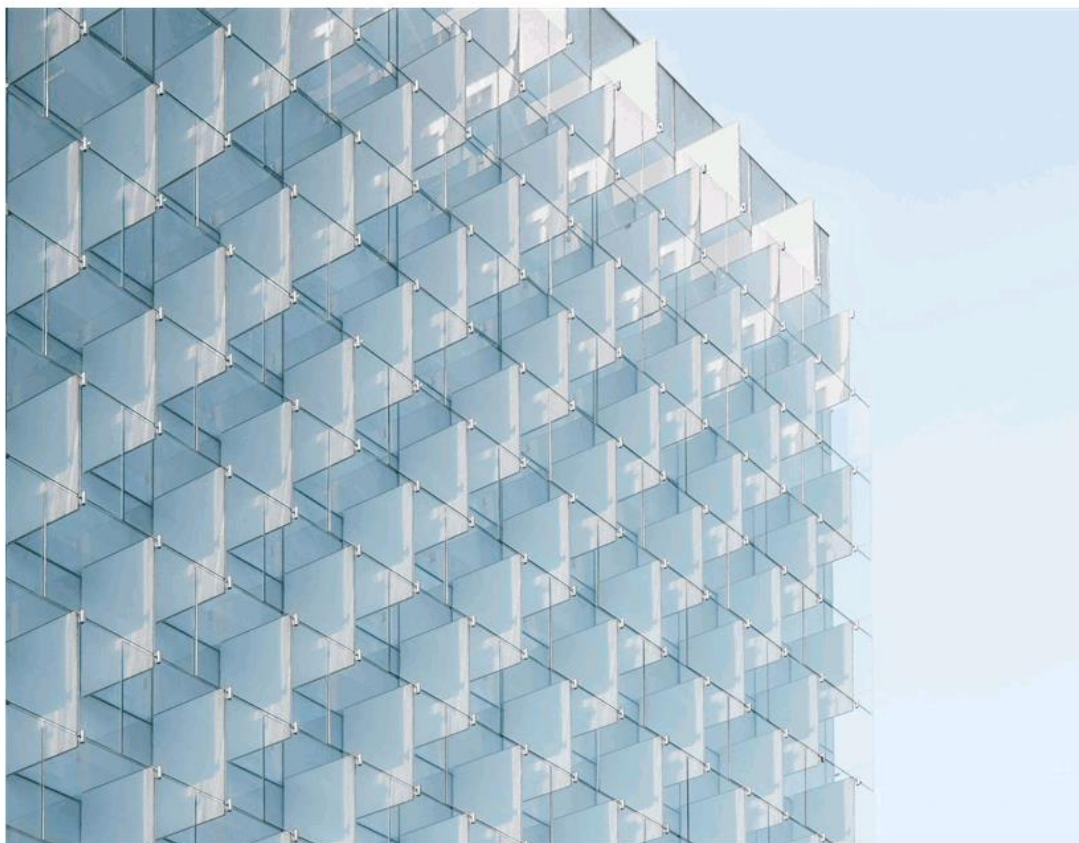


APPENDIX 9
Air Quality



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)



APPENDIX 10
Parramatta Local Environmental Plan 2011 Maps



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

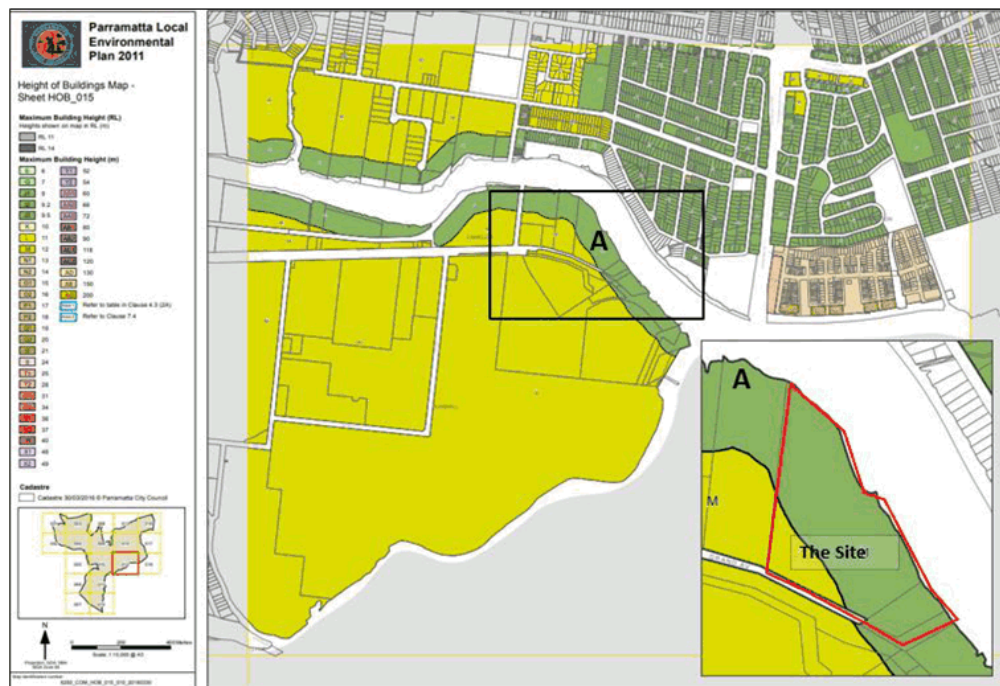


Figure 17: PLEP2011 Maximum Height Map (NSW Legislation, 2021)

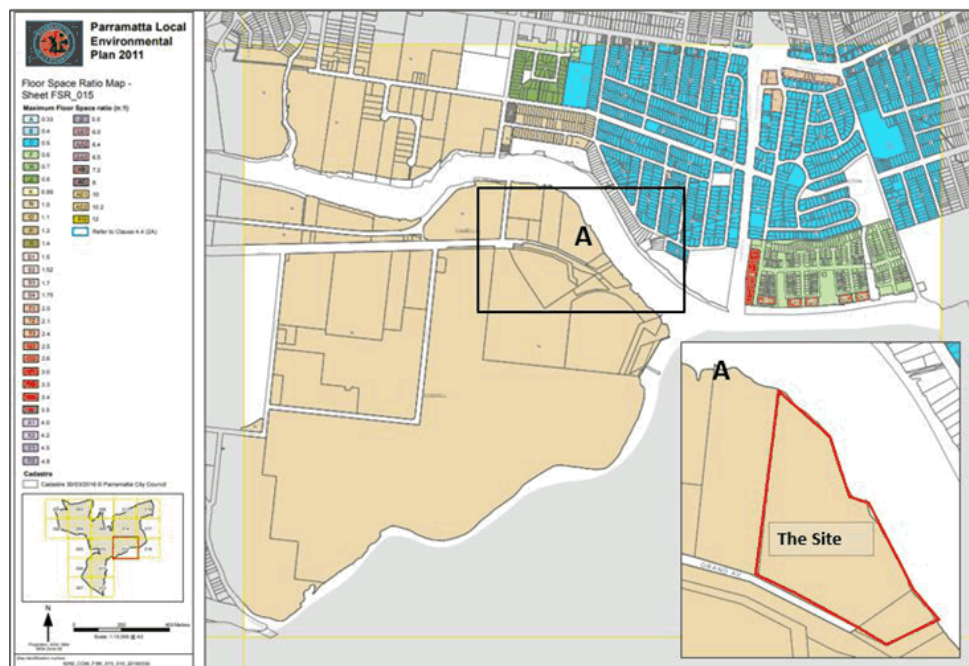


Figure 18: PLEP2011 FSR Map (NSW Legislation, 2021)



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)

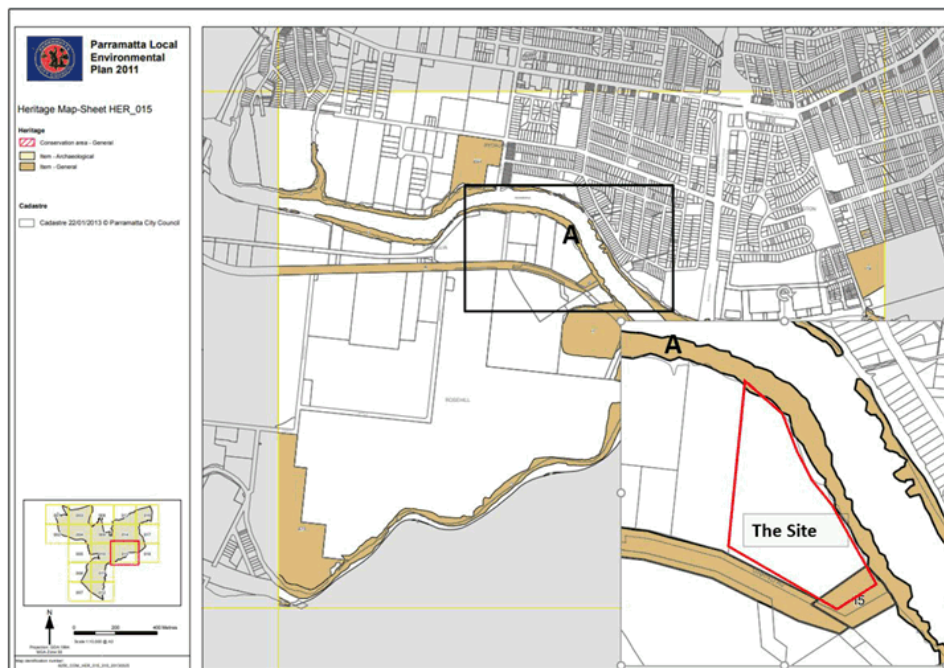


Figure 19: PLEP2011 Heritage Map (NSW Legislation, 2021)

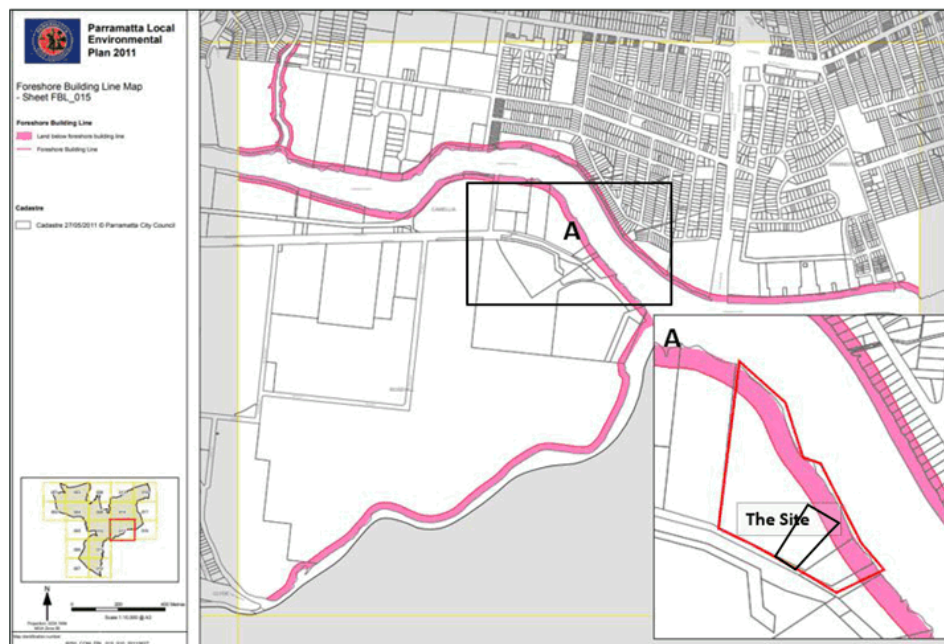
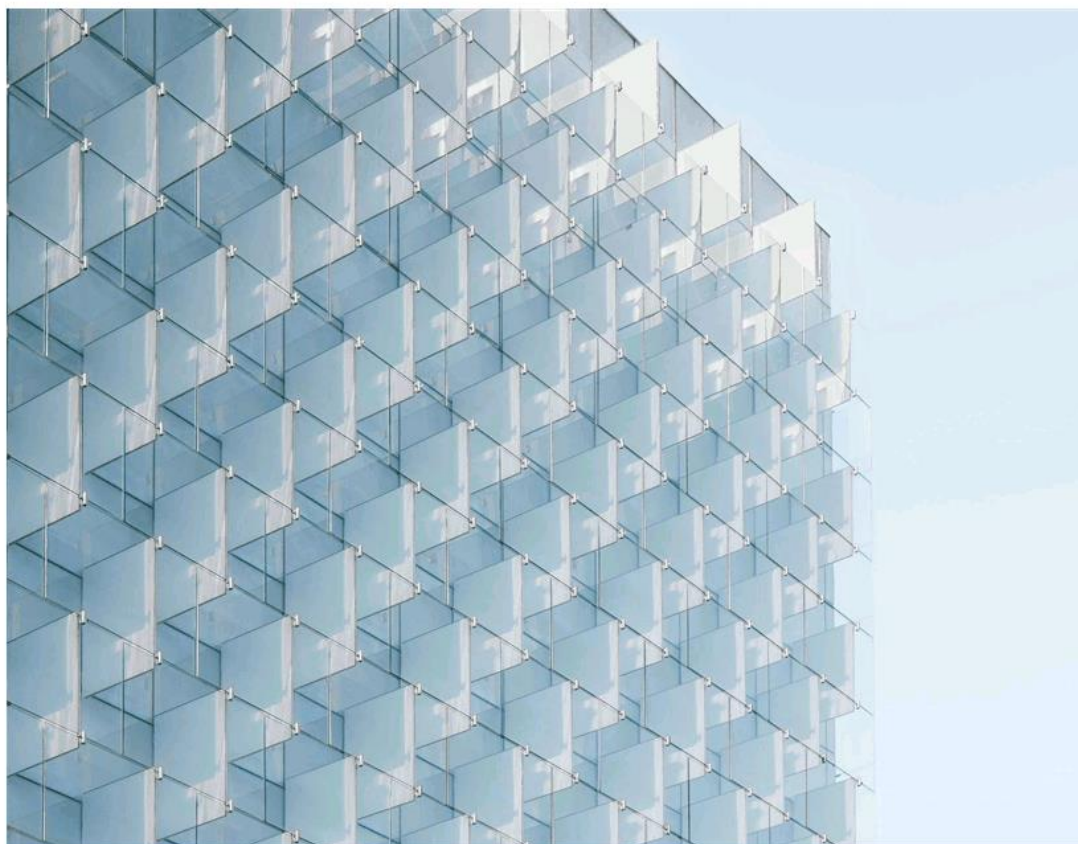


Figure 20: PLEP2011 Foreshore Building Line Map (NSW Legislation, 2021)



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Proposed Change of Use
37A-39 Grand Avenue, Camellia (Lot 2, DP539890 & Lot 2 DP615549)



APPENDIX 11
Heritage Correspondence with Parramatta Council



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Planning,
Industry &
Environment

3 September 2021

Mr Travis Lythall
Associate
Willowtree Planning
Suite 4, Level 7, 100 Walker Street
North Sydney NSW 2060

EF21/11973
SEAR 1605

Dear Mr Lythall,

Development within Mapped Coastal Wetland
37A-39 Grand Avenue, Camellia (Lot 2 DP 539890 & Lot 2 DP 6115549)
Planning Secretary's Environmental Assessment Requirements (SEAR) 1605

Thank you for your request for the Planning Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the above development proposal. I have attached a copy of these requirements.

In support of your application, you indicated that your proposal is both designated and integrated development under Part 4 of the *Environmental Planning and Assessment Act 1979* and requires an approval under the *Water Management Act 2000*. In preparing the SEARs, the Department of Planning, Industry and Environment (the Department) has consulted with the Department's Water Group and Transport for NSW. A copy of Transport for NSW's requirements is attached.

Unfortunately, the Department's Water Group was unable to respond in time. You must undertake direct consultation with them and address their requirements in the EIS.

If other integrated approvals are identified before the Development Application (DA) is lodged, you must undertake direct consultation with the relevant agencies, and address their requirements in the EIS.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, then it will require an additional approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Commonwealth Department of Agriculture, Water and the Environment on (02) 6274 1111.

Should you have any further enquiries, please contact Kathryn Moreira, Planning and Assessment, at the Department on (02) 9274 6086 or via kathryn.moreira@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Ritchie'.

Chris Ritchie
Director
Industry Assessments
as delegate of the Planning Secretary

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*.
Schedule 3 of the *Environmental Planning and Assessment Regulation 2000*.

Designated Development

SEAR Number	1605
Proposal	Freight transport facility within mapped coastal wetland area
Location	37A-39 Grand Avenue, Camellia (Lot 2 DP 539890 & Lot 2 DP 6115549)
Applicant	Streamline Container Services Pty Ltd
Date of Issue	3 September 2021
General Requirements	The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.
Key Issues	<p>The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed:</p> <ul style="list-style-type: none"> • strategic and statutory context – including: <ul style="list-style-type: none"> – a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies – a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out – a description of how the proposed development integrates with existing on-site operations – a description of any amendments to and/ or additional licence(s) or approval(s) required to carry out the proposed development. • suitability of the site – including: <ul style="list-style-type: none"> – a detailed justification that the site can accommodate the proposed development, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures – plans depicting the proposed layout, including the location of shipping containers, buildings, machinery and equipment. • noise and vibration – including: <ul style="list-style-type: none"> – a description of all potential noise and vibration sources during operation, including road traffic noise and noise from vehicles entering, exiting and manoeuvring throughout the site – a noise and vibration assessment, including cumulative impacts associated with existing operations, in accordance with the relevant Environment Protection Authority guidelines – a description and appraisal of noise and vibration mitigation and monitoring measures. • traffic and transport – including: <ul style="list-style-type: none"> – details of road transport routes and access to the site

	<ul style="list-style-type: none"> - road traffic predictions for the development during operation, including consideration of existing on-site operations - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site - an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development. <ul style="list-style-type: none"> • biodiversity – including: <ul style="list-style-type: none"> - accurate predictions of any vegetation clearing on site - an assessment of the potential impacts on any threatened species, populations, endangered ecological communities or their habitats, including mangroves and other marine vegetation - a detailed description of the measures to avoid, minimise, mitigate and/or offset biodiversity impacts. • waste management – including: <ul style="list-style-type: none"> - details of waste handling including, transport, identification, receipt, stockpiling and quality control including off-site reuse and disposal - the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the <i>NSW Waste Avoidance and Sustainable Materials Strategy 2041</i>. • soil and water – including: <ul style="list-style-type: none"> - a description of local soils, topography, drainage and landscapes - details of water usage for the proposal including existing and proposed water licencing requirements in accordance with the <i>Water Act 1912</i> and/or the <i>Water Management Act 2000</i> - an assessment of potential impacts on floodplain and stormwater management and any impact to flooding in the catchment - details of sediment and erosion controls - an assessment of the potential impacts of the proposal in line with the Natural Resource Access Regulators' <i>Guidelines for controlled activities on waterfront land</i> - an assessment of potential impacts on the quality and quantity of surface and groundwater resources - details of any augmentation to existing stormwater and wastewater management systems (including sewage), and measures to mitigate surface and groundwater impacts - characterisation of the nature and extent of any contamination on the site and surrounding area including an assessment against the provisions of SEPP 55 – Remediation of Land. • air quality – including: <ul style="list-style-type: none"> - a description of all potential sources of air and odour emissions during operation - an air quality impact assessment, including cumulative impacts associated with existing operations, in accordance with relevant Environment Protection Authority guidelines - a description and appraisal of air quality impact mitigation and monitoring measures. • heritage – including an assessment of Aboriginal and non-Aboriginal cultural heritage.
Environmental Planning Instruments and other policies	<p>The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to:</p> <ul style="list-style-type: none"> • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 • State Environmental Planning Policy (Coastal Management) 2018

	<ul style="list-style-type: none"> • State Environmental Planning Policy No. 33 – Hazardous and Offensive Development • State Environmental Planning Policy No. 55 – Remediation of Land • Parramatta Local Environmental Plan 2011 • relevant development control plans and section 7.11 plans.
Guidelines	During the preparation of the EIS you should consult the Department's Register of Development Assessment Guidelines which is available on the Department's website at https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Industries . Whilst not exhaustive, this Register contains some of the guidelines, policies, and plans that must be taken into account in the environmental assessment of the proposed development.
Consultation	<p>During the preparation of the EIS, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EIS. In particular, you should consult with the:</p> <ul style="list-style-type: none"> • Department of Planning, Industry and Environment, specifically the: <ul style="list-style-type: none"> ◦ Water Group • Transport for NSW • Deerubbin Local Aboriginal Land Council • City of Parramatta Council • the surrounding landowners and occupiers that are likely to be impacted by the proposal. <p>Details of the consultation carried out and issues raised must be included in the EIS.</p>
Further consultation after 2 years	If you do not lodge an application under Section 4.12(8) of the <i>Environmental Planning and Assessment Act 1979</i> within 2 years of the issue date of these SEARs, you must consult with the Planning Secretary in relation to any further requirements for lodgement.





Our Reference: SYD21/00980
DPIE Reference: SEAR 1605

27 August 2021

Mr. Jim Betts
Secretary
Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124

Attention: Kathryn Moreira

Dear Mr Betts,

**FREIGHT TRANSPORT FACILITY
37A-39 GRAND AVENUE, CAMELLIA**

Thank you for referring the Secretary's Environmental Assessment Requirements (SEARs) regarding SEAR 1605 'Freight Transport Facility' to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the submitted information and request the following additional issues in **TAB A** to be addressed as part of the traffic and transport impact assessment for the proposed development.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on 0409 541 879 or by email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'BEPeg'.

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney Division

TAB A**1. Traffic and Accessibility Assessment**

Provide a transport and accessibility impact assessment, which includes, but is not limited to the following:

- Details of all traffic types and volumes likely to be generated during construction and operation, including a description of haul routes and vehicle types. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation;
- An assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity;
- Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network;
- Detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards and Council's DCP;
- Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site;
- Details of road upgrades, infrastructure works, or new roads or access points required for the development;
- Details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site;
- Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and
- Measures to integrate the development with the existing/future public transport network.

Relevant Policies and Guidelines:

- Guide to Traffic Generating Developments (Roads and Maritime Services, 2002).
- NSW Freight and Ports Plans 2018-2023.
- Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas.
- Cycling Aspects of Austroads Guides.
- NSW Planning Guidelines for Walking and Cycling (Department of Infrastructure, Planning and Natural Resources (DIPNR), 2004).
- Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020).
- Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 890.3).



24 August 2021

Reference: 1021091 L01C Lot 2 39B Grand Avenue Camellia CERT.docx

Rita Badhan
Streamline Container Services Pty Ltd
37a – 39 Grand Avenue
Camellia NSW 2142

Dear Rita,

RE: Lot 2, 39B Grand Avenue, Camellia – Proposed Extended Hours Application

Acoustic Works was engaged by Streamline Container Services Pty Ltd to assess noise impacts of the onsite activities located at Lot 2, 39B Grand Avenue, Camellia. This report is in response to a letter from City of Parramatta Council (dated 15/12/2020) which states the following:

"Council is requesting a further acoustic investigation be carried out with a report provided to Council in line with the requirements of the NSW Environmental Protection Authority – Noise Policy For Industry Guide, 2017 in regards to sleep disturbance."

Acoustic Works visited the site on 22nd July 2021 to conduct attended noise measurements of the onsite activities. The purpose of this assessment was to assess noise impacts associated with the site to determine compliance at the nearest sensitive receivers for 24/7 operation using the criteria stated in the report issued by Acoustic Logic (ref: 20200988.2, dated 22/01/2021).

1. SITE DESCRIPTION

The nearest noise sensitive receiver locations were identified as follows;

1. One and two storey residential dwellings are located to the north east at 27-31 Milton street and 37-41 John Street.

Figure 1: Receiver and condenser locations



2. METHODOLOGY

Simultaneous attended measurements were conducted on the 22nd July 2021 at the measurement locations shown in Figure 1 to determine the noise impacts associated with the onsite activities. The receiver measurement location was taken at the nearest point to the site to provide a worst case scenario, with the onsite measurements taken at the nearest point to the relevant activity.

Norsonic NOR140 sound level meters were used to measure noise levels in 1/3 octave bands for both locations. All noise measurements were conducted generally in accordance with Australian Standard AS1055 'Acoustics – Description & Measurement of Environmental Noise'.

3. NOISE CRITERIA

In accordance with council requirements stated in a letter dated 15/12/2020, compliance with the night time sleep disturbance criteria is required for the site to operate. Sleep disturbance is based on the maximum noise level of events from premises during the night-time period. The Noise Policy for Industry defines sleep disturbance as a noise from a premise at a residential location that exceeds:

- LAeq,15min 40 dB(A) or the prevailing RBL plus 5 dB, whichever is the greater, and/or
- LAFmax 52 dB(A) or the prevailing RBL plus 15 dB, whichever is the greater.

Unattended noise monitoring was conducted by Acoustic Logic between 21st and 28th September at 84 Antoine Street, Rydalmere. Based on the measured noise levels in the acoustic report issued by Acoustic Logic (ref: 20200988.2, dated 22/01/2021) the relevant sleep disturbance criteria for the assessment is as follows:

Table 1: Sleep disturbance criteria

Time period	Criteria Leq(15min) dBA	Criteria LAFmax dBA
Night	43	53

4. MEASURED NOISE LEVELS

To assess the noise levels associated with the onsite activities, noise measurements were taken on Thursday the 22nd July 2021 at the positions shown in Figure 1 between the hours of 6-9pm with all onsite activities conducted under normal operating conditions. Ambient noise in the locality at the time of the assessment included traffic noise from the surrounding road network.

Due to the existing ambient levels in the area influencing the assessment of LAeq noise measurements of onsite activities at the receiver location, a component assessment was undertaken to determine the noise impacts. The background noise can influence measured noise levels if ambient levels are not at least 10dB below the noise impacts, therefore ambient Leq levels were measured to determine the component levels associated with the onsite activities. The results of the compliance assessment with the sleep disturbance criteria using the measured component levels are shown in Table 2.

Table 2: Measured noise levels

Description	Measured source noise levels			Measured receiver noise levels			Night Criteria		Component Level (Leq T dBA)	Night criteria Complies (yes/no)
	L _{Aeq,T} dBA	L _{Amax} dBA	Distance	L _{Aeq,T} dBA	L _{Amax} dBA	Distance	L _{Aeq,T} dBA	L _{AFmax} dBA		
Container movements	70	83	20m	44	51	~220m	43	53	34	yes
Container loading onto truck	71	82	20m	46	53	~220m	43	53	41	yes
2 trucks, container forklift movements, container drop	71	85	20m	47	57	~220m	43	53	43	yes
Container forklift and truck movements	72	85	20m	46	52	~220m	43	53	41	yes
Unloading truck, placing container	71	86	26m	46	53	~220m	43	53	41	yes
Truck arrivals and departures	73	83	26m	45	52	~220m	43	53	35	yes
Background measurement	46	-	-	45	-	-	-	-	-	-

Noise levels associated with the onsite activities were found to satisfy the criteria. To ensure compliance with the sleep disturbance criteria is maintained, refer to Section 5 for further recommendations.

5. RECOMMENDATIONS

The following management controls are recommended to ensure compliance at the nearest noise sensitive receivers is maintained:

- Staff should avoid dropping containers at all times. Storage containers shall be carefully placed when relocating including for loading and unloading of trucks.
- Trucks are to drive to the designated loading/unloading zone and shall depart as soon as possible. No additional truck movements are to be conducted on site.
- Work shall be minimised on the waterfront area of the site during the night time period.

6. DISCUSSION

A review of the onsite activities located at Lot 2, 39B Grand Avenue, Camellia was conducted. Based on the measured noise levels listed in Table 2, compliance is predicted on the conditions the recommended management controls as nominated in Section 5 are implemented.

If further complaints are received, we recommend a compliance assessment be conducted during the early morning period of noise impacts associated with the onsite activities. For non-compliance, further assessments and acoustic treatments may be recommended.

We trust this information meets with your current requirements. Should you have any queries please do not hesitate to contact us.

Regards,



Benjamin Cox
Acoustic Consultant
acousticworks)))



Transport Statement

Proposed Change of Use

37A-39 Grand Avenue, Camellia

15/10/2021

P1818r01



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Project No	1818
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Revision History

Revision No.	Date	Details	Author	Approved by
-	14/09/2021	Draft	S. Bandaranayake	J. Laidler
Issue I	15/10/2021	Final	J. Laidler	J. Laidler

This document has been prepared for the sole use of the Client and for a specific purpose, as expressly stated in the document. Ason Group does not accept any responsibility for any use of or reliance on the contents on this report by any third party. This document has been prepared based on the Client's description of its requirements, information provided by the Client and other third parties.

1818r01 DA TS_37A-39 Grand Avenue, Camellia



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Glossary

Acronym	Description
AGRD	Austroads Guide to Road Design
AGTM	Austroads Guide to Traffic Management
CC	Construction Certificate
Council	City of Parramatta
DA	Development Application
DCP	Development Control Plan
DoS	Degree of Saturation
DPIE	Department of Planning, Industry and Environment
FSR	Floor space ratio
GFA	Gross Floor Area
HRV	Heavy Rigid Vehicle (as defined by AS2890.2:2018)
LEP	Local Environmental Plan
LGA	Local Government Area
LoS	Level of Service
MOD	Section 4.55 Modification (also referred as a S4.55)
MRV	Medium Rigid Vehicle (as defined by AS2890.2:2018)
NHVR	National Heavy Vehicle Regulator
OC	Occupation Certificate
RMS Guide	Transport for NSW (formerly Roads and Traffic Authority), Guide to Traffic Generating Developments, 2002
S4.55	Section 4.55 Modification (also referenced as MOD)
S96	Section 96 Modification (former process terminology for an S4.55)
SRV	Small Rigid Vehicle (as defined by AS2890.2:2018)
TDT 2013/04a	TfNSW Technical Direction, Guide to Traffic Generating Developments – Updated traffic surveys, August 2013
TfNSW	Transport for New South Wales
TIA	Transport Impact Assessment
TIS	Transport Impact Statement
veh/hr	Vehicle movements per hour (1 vehicle in & out = 2 movements)

1 Introduction

1.1 Overview

Ason Group has been engaged by Streamline Container Services Pty Ltd to prepare a Transport Statement (TS) to support the approval of a Freight Transport Facility operating hours at 37A-39 Grand Avenue, Camellia (the Site).

The Site's current operations have been deemed unlawful, as these activities were outside the approvals (conditions within DA/590/2018/A). It is understood that — prior to recent action by Council — the site was operating as a Freight Transport Facility (storage, loading/unloading and maintenance of storage containers) 24 hours, 7 days per week whereas the existing approval permits operation of a Truck Depot 24 hours a day, 7 days per week.

The Site is located within the Parramatta City Council (Council) Local Government Area (LGA) and is therefore subject to that council's controls.

1.2 Key References

In preparing this TS, Ason Group has references key planning documents, including:

- Parramatta Development Control Plan 2011 (DCP)
- Parramatta Local Environmental Plan 2011 (LEP)

This TS also references general access, traffic and parking guidelines, including:

- Australian Standard 2890.1: Parking Facilities – Off Street Car Parking (AS 2890.1)
- Australian Standard 2890.2: Parking Facilities –Off Street Commercial Vehicle Facilities (AS2890.2)
- Australian Standard 2890.6: Parking Facilities –Off Street Parking for People with Disabilities (AS2890.6)
- Roads and Maritime Services, Guide to Traffic Generating Developments (RMS Guide)

Reference should also be made to the previous approvals which have been outlined below.

1.3 Previous Approvals.

As part of preparing this proposal, it is important to understand the previous approvals within the Site. As such, the following approvals have been granted.

TABLE 1: PREVIOUS APPROVALS

Development Application No.	Description of Development	Date of Determination
1054/J	Transport terminal and bulk storage tank farm	1 December 1969
1730/E	Extension of existing drum dock	20 March 1978
1846/R/163/772	Storage and repair of empty transport containers	23 July 1979
3259/V/163/772	Extension to existing office	17 December 1979
L91/39288	Food waste recycling depot	20 July 1992
DA/433/2013	Remediation of land and demolition works	20 December 2013
DA/433/2013/A	Section 96(1) modification to the approved development application for the remediation of the site. The modification includes the correction to an error within the description of the property.	20 January 2014
DA/986/2017	Use of the site as a temporary Bus Depot	13 March 2018
DA/590/2018	Change of use to truck depot including storage of recycling skip bins and shipping containers and installation of a diesel fuel tank	21 December 2018
DA/590/2018/A	Section 4.55 (1) modification to approved DA/590/2018 for a change of use to truck depot including storage of recycling skip bins and shipping containers and installation of a diesel fuel tank. Modifications include a correction to approved hours of operation (Condition 30).	4 February 2019

In light of the above development history of the site, it has been demonstrated that the proposed use of the site as a freight transport facility will be commensurate to the history of the site with regard to previously approved uses.

2 Overview of Proposal

2.1 Summary of Proposed Development

In summary, there is no material change in the GFA of the development as part of this report. The application seeks to use the Site as a freight transport facility for the storage, loading/unloading and maintenance of storage containers. The following summarises key aspects of the Proposal:

- Returning the Site to its original use, involving the storing of shipping containers; moving containers around the Property; loading and unloading containers onto trucks,
- Manoeuvring, parking, storing and maintaining vehicles associated with the use, including prime movers, semi-trailers and forklifts; and other ancillary activities,
- The following trip generations are expected as a result of the above;
 - Up to 70 heavy vehicle movements per day
 - Up to 78 Light Vehicle movements per day;
- The proposed use seeks consent to operate 24 hours, 7 days a week.

A reduced copy of the relevant plan is reproduced at a reduced scale for context below.

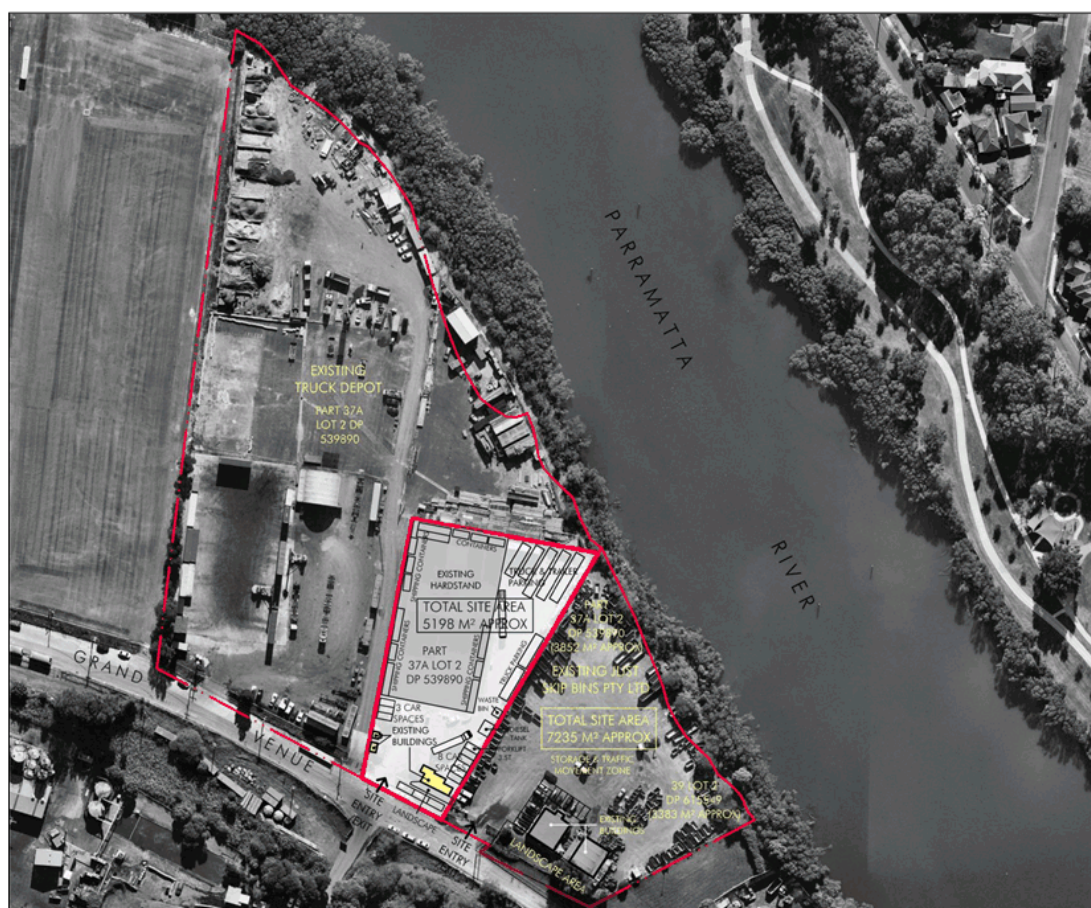


Figure 1: Site Plan

3 Existing Conditions

3.1 Site and Location

The Site is located at 34A-39 Grand Avenue, Camellia and is legally described as Lot 2 in DP539890. It has frontages to industrial land to the east and west, a northern frontage to Parramatta River and the southern frontage to Grand Avenue.

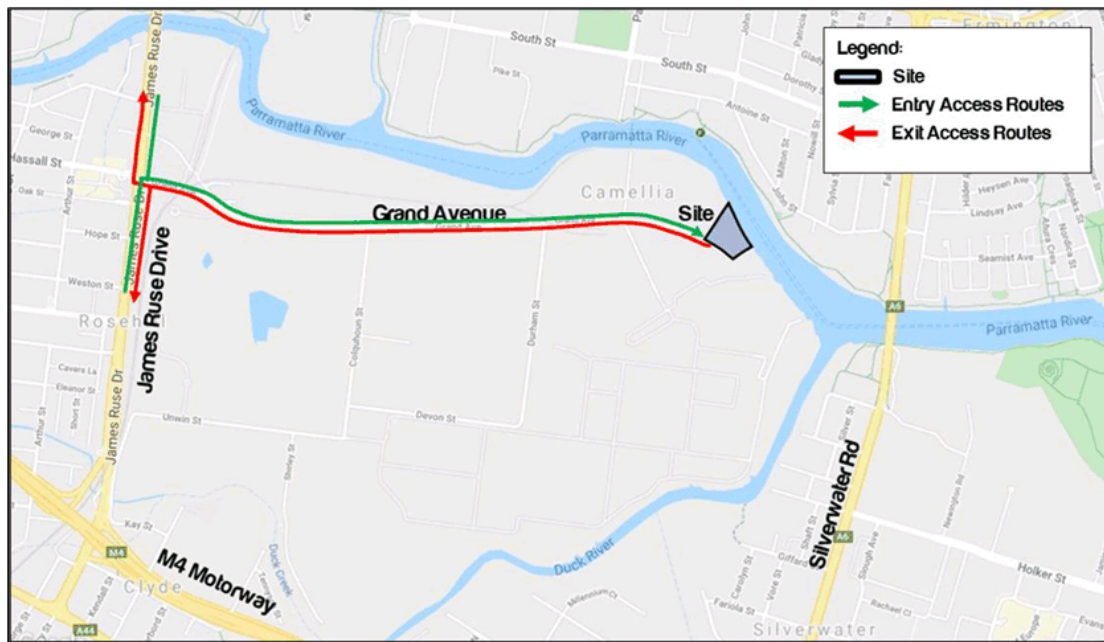


Figure 2: Site Location & Surrounding Road Network, And Access Routes

3.1.1 Existing Land Use

Currently zoned IN3 Heavy Industrial under the Parramatta Local Environmental Plan 2011. A majority of the 37A Grand Avenue towards the north-west is currently used as a temporary bus depot approved under DA/986/2017. The portion of the site where the truck depot is to be located is currently being used to park trucks and storage bins with parking.

The Site is currently occupied by a single demountable building toward the south-east corner, several shipping containers and skip bins.

3.1.2 Existing Site Access

The site is currently accessed via 4 separate driveways, each providing entry and exit points to separate parts of the site. Each driveway permits full turning movements for cars and heavy vehicles to Grand Avenue as shown below.



Figure 3: Site Access

3.2 Surrounding Road Network

3.2.1 Road Hierarchy

The key roads providing in the vicinity of the site are summarised below:

- **James Ruse Drive** - A TfNSW Classified Road (MR309) that runs in a north-south direction approximately 2 kilometres to the west of the Site. In the vicinity of the Site, James Ruse Drive carries in the order of approximately 71,000 vehicles a day in both directions.
- **Grand Avenue** – A local road that generally runs in an east-west direction fronting the Site. It connects to James Ruse Drive with a signalised intersection.
- **Thackeray Street** – A local road that generally runs in a north-south direction approximately 280 metres to the west of the Site.

3.2.2 Existing On-street parking controls

Grand Avenue has unrestricted parking on the northern side fronting the Site for approximately 280 metres. Although the southern side of Grand Avenue has no parking restrictions, the lack of kerb and gutter, along with design considerations would suggest that no parking is available.

4 Parking and Servicing Requirements

4.1 Car Parking

4.1.1 Prior Approval Rates

As part of the approvals for the truck depot (DA/590/2018/A), a condition outlined that parking is to be provided as per the approved plans. The plans showed a total of 20 car parking spaces, therefore a provision of 20 car parking spaces was needed.

As such, given that the number of employees has been provided by the Client, and that the GFA of the Site does not change as part of this application, the previously approved quantum of parking spaces would also be applicable for this application.

4.1.2 RMS Guide Rates

A review of Council's DCP refers to the RMS Guide when a land use is not defined within the DCP. In this case reference to Section 5.10.2 of the RMS Guide notes that for Container Service Facilities;

"Off-street employee parking (i.e. fleet and contract operated) as well as visitor parking, must be provided to satisfy the peak demand, as determined by surveys of similar existing developments. The location of this parking must be independent of the normal operations of the depot."

Information provided by the Client indicates that the light vehicle parking requirements in accordance with their operational needs. In this instance, 13 spaces are required to satisfy the peak demand of the Site.

4.1.3 Parking Assessment

Noting that there is up to 13 staff on site at any one time, coupled with the fact that not all staff will be single drivers, the application of the approved rates to the proposed development results in the proposal providing 24 on-site car parking spaces, indicating a surplus of 11 car parking spaces and thus satisfying and exceeding requirements.

It is noted that the additional on-site car parking spaces are provided as a requirement of the tenants to allow for flexibility in terms of on-site parking facilities and for any visitors that may arrive to Site.

5 Traffic Assessment

5.1 Traffic Generation

Previously, the approved bus depot (ref: DA/986/2017) generated in the order of 120 light vehicle movements and 120 heavy vehicle movements per day. Subsequently, the approved truck depot (ref: DA/590/2018/A) had approval for 20 heavy vehicle movements per day. Both had approval for 24 hour, 7-days a week operation.

This application does not seek approval to alter the GFA, nor are there any fundamental impacts to staff numbers or traffic generation proposed against either of the previous approvals noted above.

In relation to this proposal, light vehicle movements are primarily influenced by staff vehicle movements with shift changes. Furthermore, there could be a further increase in light vehicle trip generation from employees leaving during lunch and for 'other errands'. Therefore, noting that a maximum of 13 staff currently work at any one time, assuming 1 shift change over in a 24-hour period plus visitors and ancillary trips, a total yield of 39 vehicles, or 78 light vehicle movements would be sufficient to capture all trips.

Operating information received by the client proposes that the site will have a heavy vehicle traffic generation of 35 vehicles, or 70 movements per day. Again, this generation is spread over a 24-hour period and not representative of peak periods.

Although the trip generation exceeds those approved within the truck depot, the proposed trip rates are greatly reduced from against those approved within the bus depot. Again, noting that there is no change in GFA, the approval from The table below highlights the bus depot approved and current operational traffic generation numbers over a 24-hour period.

TABLE 2: TRAFFIC GENERATION COMPARISON

	DA/986/2017 Approval	Proposed	Difference
Light Vehicle Movements	120	78	-42
Heavy Vehicle Movements	120	70	-50
TOTAL	240	148	-92

Note: 1 Vehicle = 1 in movement + 1 exit movement = 2 movements

5.2 Traffic Impacts

The previously approved 240 vehicle movements per day (with respect to the truck depot) also provided an outline of the arrival and departure times across a 24-hour period. This breakdown effectively provided a breakdown of the movements were permitted across all hours of the day and night.

As outlined within **Table 2**, there is a reduced number of vehicle movements across the 24-hour period compared to those previously approved, therefore there would be no material impact to wider road network as a result of the Site increasing operating hours to 24-hours a day, 7 days a week.

Therefore, the traffic impacts (or lack thereof) associated with the proposal are acceptable.

6 Conclusions

6.1 Key Findings

The key findings of this Transport Statement are:

- Ason Group has been engaged by Streamline Container Services Pty Ltd to prepare a Transport Statement (TS) in response to a Council request, which deemed the recent operations as unlawful as they were outside the scope of the approved Truck Depot articulated within DA/590/2018/A
- This proposal now seeks consent to operate the site as a Freight Transport Facility 24 hours, 7 days a week.
- The DA includes:
 - No changes to the GFA of warehousing or office area.
 - No change in parking provision to those already approved,
 - A net reduction in overall trip generation compared to the previously approved Site.
- As a result of the proposal, the Site will generate the following traffic volumes:
 - 70 heavy vehicles per day; and
 - 78 light vehicles per day
- Application of the parking rates indicate that the proposal can readily accommodate the anticipated parking demand, with no requirement for vehicles to parking on the public road network.
- Traffic Generation indicates that there is a reduction of trip generation of up to 118 light and heavy vehicles per day against the previously approved use.
- The vehicles arrival / departure profile of the previous truck depot indicated that trucks would arrive and depart across all hours of the day, 7 days per week, therefore the reduced trip generation would have no material impact on the road network.

6.2 Summary

In summary, the Proposal is supportable on traffic planning grounds and will not result in any adverse impacts on the surrounding road network or the availability of on-street parking.



21 September 2021

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Ecological Impact Assessment: 37A Grand Avenue, Camellia

Dear Hugh,

Cumberland Ecology was engaged by Willowtree Planning on behalf of Streamline Container Services Pty Ltd to undertake an Ecological Impact Assessment for a site within part of Lot 2 DP 539890 located at 37A Grand Avenue, Camellia (the 'Subject Site'). It is understood that the Ecological Impact Assessment will facilitate change in use of the Subject Site to allow for the storage of shipping containers as it is currently only approved for use as a Truck Depot.

Appendix A of this letter contains the Ecological Impact Assessment.

Appendix B contains an assessment of the likelihood of occurrence of threatened flora and fauna species.

Appendix C of this letter contains a list of the flora species identified during the site survey.

Supporting figures are attached to the end of this letter.

If you have any questions, feel free to contact myself at our Sydney Office on (02) 9868 1933.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bryan Furchert', is written over the typed name.

Bryan Furchert
Project Manager/Botanist
Bryan.Furchert@cumberlandecology.com

APPENDIX A :

Ecological Impact Assessment

A.1. Introduction

A.1.1. Introduction

Cumberland Ecology has been requested by Willowtree Planning to prepare an Ecological Impact Assessment to accompany a Development Application (DA) for modification of use of part of Lot 2 in DP 539890 (the 'Lot'), located within 37A Grand Avenue, Camellia NSW (hereafter referred to as 'the Subject Site', **Figure 1**). The Subject Site is zoned as IN3 Heavy Industrial Zone under the Parramatta Local Environment Plan 2011. Although the Subject Site in **Figures 1-4** is shown to contain small areas of vegetation in the north-east, this area is considered to be excluded from the Subject Site for the purposes of this assessment as it occurs outside the fenced area of the site in which operations occur.

Streamline Container Services Pty Ltd are currently occupying the Subject Site which comprises only part of the Lot. The Lot is currently approved for use only as a Truck Depot. The existing Truck Depot in which Streamline Container Services operate, was approved under DA/590/2018. In February 2021 Parramatta Council served a Direction to Take preventive Action as operations were deemed unlawful as they were inconsistent with the previous consent DA/590/2018 and as a result, operations between 10 pm and 7 were ceased. In order to allow the use of a portion of the Lot that was not permitted under the previous DA, a new DA is being prepared.

The Lot is mapped as occurring within 'Proximity Area to Coastal Wetlands' with a small section of the adjacent Lot 2 DP615549 (south-eastern corner) mapped as containing 'Coastal Wetlands' pursuant to *State Environmental Planning Policy (Coastal Management) 2018* (Coastal Management SEPP) (**Figure 2**). Clause 10(2) of the Coastal Management SEPP states that any development on land identified as coastal wetland is deemed to trigger designated development.

In accordance with Section 1.5(1)(a) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), 'the use of land' is classified as development, for which the proposal is deemed as designated development. Pursuant to Schedule 2, Part 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), Secretary's Environmental Assessment Requirements (SEARs) must be obtained from the NSW Department of Planning, Industry and Environment (DPIE).

This letter has been prepared to assess the ecological impacts of the proposed DA and determine whether there will be any impacts to threatened flora and fauna species, populations, or ecological communities listed under the NSW *Biodiversity Conservation Act 2016* (BC Act) or the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

A.1.2. Description of the Subject Site

The Subject Site occurs within part of the Lot, and has chain link fences on all four sides to separate it from adjoining areas of the Lot and Lot 2 DP615549 to the east. The Subject Site is currently used to store shipping containers, and with the exception of several site sheds, does not contain anything else besides hard stand areas comprising concrete and asphalt.

A.1.3. Proposed Development Application

The proposed DA is to change the allowed operations within the Subject Site only, from utilisation as a truck depot, to allow the storage and movement of shipping containers, and will not include any new construction.

A.1.4. Legislation

Under the NSW Land Management and Biodiversity Conservation (LMBC) reform, the NSW Parliament passed the following two Acts in November 2016:

- Biodiversity Conservation Act 2016 (BC Act), which replaces the *Threatened Species Conservation Act 1995*, the *Nature Conservation Trust Act 2001* and parts of the *National Parks and Wildlife Act 1974*; and
- *Local Land Services Amendment Act 2016* (LLSA Act), which replaces the *Native Vegetation Act 2003* and the *Native Vegetation Regulation 2005*.

These reforms commenced on 25 August 2017 and are now in force.

A key part of the reforms is the introduction of the Biodiversity Offsets Scheme (BOS). The BOS is intended to simplify biodiversity assessment and improve biodiversity outcomes by creating consistent assessment requirements to measure the likely biodiversity loss of development proposals and gains in biodiversity value achieved at offset sites through active management.

The BOS applies to local development (assessed under Part 4 of the EP&A Act) that is likely to significantly affect threatened species or communities or that triggers threshold levels for when assessment via the BOS is required. The triggers for entry into the BOS are if a Part 4 development:

- Is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test of significance in Section 7.3 of the BC Act;
- Exceeds the biodiversity offsets scheme threshold according to Clause 7.1 of the NSW *Biodiversity Conservation Regulation 2019* (BC Regulation), with the thresholds being:
 - The clearing of native vegetation of an area above a prescribed threshold based on the minimum lot size; or
 - The clearing of native vegetation, or other prescribed action, on land included on the Biodiversity Values Map.
- Is carried out in a declared area of outstanding biodiversity value (AOBV).

If a project triggers any of the above thresholds, assessment according to the BOS is required, which involves the preparation of a Biodiversity Assessment Development Report (BDAR) in accordance with the Biodiversity Assessment Method (BAM). An assessment of whether the proposed DA will trigger the above thresholds is provided below.

No threatened species are considered likely to utilise the Subject Site to the extent they would be impacted by the proposed DA (see **Appendix B**). As such Tests of Significance have not been undertaken as no threatened species are considered likely to be impacted by the DA.

The Subject Site is zoned as IN3 which does not have a minimum lot size and therefore the actual lot size of 3.14 ha is used to determine the native vegetation clearance threshold. As such, any clearing of native vegetation of 0.5 ha or more would trigger entry into the BOS (see **Table 1**). No areas of native vegetation are required to be cleared or otherwise modified within the Subject Site. As such the BOS is not triggered by exceeding this threshold.

Table 1 Native vegetation clearance thresholds for triggering entry into the BOS

Minimum Lot Size	Area of Clearing
Less than 1 hectare	0.25 hectares or more
Less than 40 hectares but not less than 1 hectare	0.5 hectares or more
Less than 1,000 hectares but not less than 40 hectares	1 hectare or more
1,000 hectares or more	2 hectares or more

We have reviewed the NSW Biodiversity Values Map and Threshold Tool, and note the Subject Site is not mapped on the Biodiversity Values Map. Therefore, entry into the BOS is not triggered via this mechanism. Some vegetation along Parramatta River immediately to the north-east of the Subject Site is mapped as having biodiversity values but none of this vegetation is proposed to be removed under the DA.

For the aforementioned reasons the proposed DA does not trigger entry in the BOS and a BDAR is not required. Subsequently, this Ecological Impact Assessment has been prepared to assess the impacts to biodiversity of the proposed DA.

A.2. Methodology

A.2.1. Desktop Assessment

Database analysis was conducted for the locality using the NSW Department of Planning, Industry and Environment (DPIE) Threatened Species Data Collection (BioNet) (EES 2021). The locality is defined as the area within a 10 km radius of the Subject Site. The Atlas of NSW Wildlife Database search was used to generate records of threatened flora and fauna species listed under the BC Act and the EPBC Act within the locality of the Subject Site. The lists generated from these databases were reviewed against available knowledge of the Subject Site, in conjunction with the abundance, distribution, and age of records to ascertain the likelihood of occurrence of threatened species within the Subject Site (**Appendix B**).

In addition the following mapping covering the site was reviewed:

- DPIE Biodiversity Values Map and Threshold Tool;
- Coastal Management SEPP Mapping Viewer; and
- Native Vegetation of the Sydney Metropolitan Area (OEH 2016).

A.2.2. Flora Assessment

A flora assessment was undertaken by a Cumberland Ecology botanist on the 7 August 2021 within the Subject Site to assess the presence of threatened flora species and/or threatened ecological communities, and to map any native vegetation communities present.

A random meander survey was undertaken across the entirety of the Subject Site except for central areas which were visibly unvegetated and had operational machinery at the time of the survey. All flora species were recorded within the Subject Site and areas to the north along Parramatta River which were visible through the fence. The river front could not be accessed from the Subject Site and access is blocked from adjoining streets within proximity of the Subject Site.

Flora species recorded within the Subject Site are provided in **Appendix C**.

A.2.3. Fauna Habitat Assessment

A fauna habitat assessment was undertaken on 7 August 2021. The assessment included consideration of important indicators of habitat condition and complexity including the occurrence of microhabitats such as tree hollows, fallen logs, bush rock, and wetland areas such as creeks and soaks. Structural features considered included the nature and extent of the understorey and ground stratum and extent of canopy. The survey also included an assessment of the presence of habitat features suitable for use by threatened fauna species known from the locality.

A.3. Results

A.3.1. Vegetation Communities

No native vegetation communities are mapped within the Subject Site by the Native Vegetation of the Sydney Metropolitan Area mapping project (OEH 2016) – the most recent broad-scale vegetation mapping covering the locality. The nearest native vegetation mapped to the Subject Site is the community Estuarine Mangrove Forest, which is mapped along the banks of the Parramatta River to the north (**Figure 3**).

A.3.1.1. Vegetation within the Subject Site

The Cumberland Ecology Survey confirmed no native vegetation is present within the Subject Site. Vegetation along the southern boundary of the Subject Site is limited to grassland dominated by exotic grass species (**Photograph 1**). The exotic shrubs *Olea europaea* subsp. *cuspidata* (African Olive), and *Senecio pterophorus* are present along the fence line as isolated individuals where they are sheltered from mowing. The grassland is dominated by exotic grass species including *Cenchrus clandestinus* (Kikuyu), *Cynodon dactylon* (Couch), and *Eragrostis curvula* (African Lovegrass). Exotic forbs such as *Plantago lanceolata* (Lamb's Tongues), *Modiola caroliniana* (Red-flowered Mallow) and *Bidens pilosa* (Cobbler's Pegs) are common.

The remainder of the Subject Site is devoid of vegetation consisting only of hard stand areas of concrete and asphalt, with the exception of some vegetation which is present in dirt areas along the eastern fence of the Subject Site. Vegetation in these areas is limited to exotic grasses and forbs (**Photograph 2**). Grass species include *Cenchrus clandestinus*, and *Chloris virgata* (Feathertop Rhodes Grass). Forbs include *Bidens pilosa*, *Lactuca saligna* (Willow-leaved Lettuce) and *Cirsium vulgare* (Spear Thistle).

Photograph 1 Exotic Dominated Grassland along the southern boundary of the Subject Site



Photograph 2 Exotic forbs and grasses along eastern boundary of Subject Site



Photograph 3 Unvegetated central areas of Subject Site



A.3.1.2. Vegetation along Parramatta River

Vegetation immediately to the north of the Subject Site along Parramatta River consists of degraded occurrences of Estuarine Mangrove Forest. A large proportion of this vegetation immediately adjacent to the Subject Site consists of the exotic woody species *Ligustrum lucidum* (Broad-leaved Privet), and the exotic species *Morus alba* (White Mulberry) is also present. The native species *Avicennia marina* subsp. *australasica* (Grey Mangrove), is present, typical of the Estuarine Mangrove Forest community, and isolated individuals of *Casuarina glauca* (Swamp Oak), indicating the areas immediately to the north of the Subject Site historically formed a transitional area with the Estuarine Swamp Oak Forest community, which may have occurred across the Subject Site.

The ground layer consists of mud in intertidal areas and was dominated by the exotic grass species *Cenchrus clandestinus* in drier areas.

Photograph 4 Vegetation along Parramatta River



A.3.2. Fauna Habitat

Due to the complete lack of native vegetation within the Subject Site, fauna habitat is extremely limited. No habitat is present for roosting or nesting species which require hollows, and no habitat is present for nesting species which require trees. Foraging habitat is also considered to be absent for the vast majority of species which generally require vegetation for food and shelter resources, or provide food and shelter resources for prey species.

Habitat is limited to species which are able to utilise small microhabitats such as invertebrate species, and small common species of reptiles such as the Garden Skink (*Lampropholis guichenoti*) which forage on small invertebrate species.

A.3.3. Threatened Flora and Fauna Species

Assessments of the likelihood of occurrence of threatened flora and fauna species which have previously been recorded within the locality are provide in **Table 2** and **Table 3** in **Appendix B**. These indicate due to the lack of native vegetation and vegetation in general, and other habitat items such as buildings with accessible roof cavities, no threatened flora or fauna species are considered likely to occur within the Subject Site.

A.4. Impact Assessment

The proposed DA is not expected to impact on any threatened species, ecological communities, or threatened populations listed under the BC Act of the EPBC Act, or Coastal Wetlands for the following reasons:

- Native vegetation and associated habitats have already been historically removed across the entirety of the Subject Site, which prior to use to store shipping containers was a large, asphalted truck depot;
- There is a complete lack of habitat within the Subject Site for any threatened species;
- The proposed DA does not propose to remove any vegetation or impact any fauna habitat as it is simply to continue operating the site as a shipping container storage facility as it is operated currently; and
- The Subject Site is already completely fenced with a tall chain link fence, and as such inadvertent vehicle damage to adjoining offsite vegetation is not likely, and existing sediment fencing along adjoining vegetation also prevents any sediments if spilled etc. washing off from the site into Parramatta River.

As the potential ecological impacts of the proposed DA will be negligible, no mitigation measures are proposed.

A.5. References

EES. 2021. BioNet Atlas. Environment, Energy and Science.

OE. 2016. The Native Vegetation of the Sydney Metropolitan Area - VIS_ID 4489. Office of Environment and Heritage, Sydney.

APPENDIX B :

Likelihood of Occurrence - Threatened Species

Table 2 Likelihood of Occurrence - Threatened Fauna Species

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
Amphibia							
Hylidae	<i>Litoria aurea</i>	Green and Golden Bell Frog	E1	V	15977	Marshes, dams, stream sides, particularly those containing bulrushes or spikerushes; unshaded water bodies free of <i>Gambusia</i> form optimum habitat; vegetation and/or rocks are needed for sheltering.	Unlikely to occur. No aquatic habitats within the Subject Site.
Myobatrachidae	<i>Pseudophryne australis</i>	Red-crowned Toadlet	V	-	2	Has a distribution restricted to the Sydney Basin, from Pokolbin in the north, Nowra to the south, and Mt Victoria in the Blue Mountains to the west. It inhabits ephemeral drainage lines below sandstone ridges that often have shale caps, in open forests on Hawkesbury and Narrabeen Sandstones. The species utilises dense vegetation and debris besides water in the breeding season. Outside of breeding season the species is found under rocks, logs, and leaf litter nearby to breeding areas.	Unlikely to occur. No ephemeral streams within the Subject Site.
Aves							
Accipitridae	<i>Circus assimilis</i>	Spotted Harrier	V	-	4	Occurs throughout mainland Australia except in densely forested or wooded habitats of the coast, escarpment, and ranges. It inhabits open grassy woodland, shrubland, and grassland. It nests in trees and preys on terrestrial mammals, birds, and reptiles, and will occasionally consume carrion.	Unlikely to occur. No suitable native vegetation communities within the Subject Site.
Accipitridae	<i>Haliaeetus leucogaster</i>	White-bellied Sea-Eagle		M	336	Found in coastal habitats and around terrestrial wetlands, including rivers, swamps, lakes, and the sea.	Unlikely to occur. No aquatic habitats or

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
							native vegetation within the Subject Site.
Accipitridae	<i>Hieraaetus morphnoides</i>	Little Eagle	V	-	6	Occupies open eucalypt forest, woodland, or open woodland. Sheoak or acacia woodlands and riparian woodlands of interior NSW also used. Nests in tall living trees within a remnant patch, where pairs build a large stick nest in winter. Preys on birds, reptiles, and mammals, occasionally adding large insects and carrion.	Unlikely to occur. No forest or woodland habitats.
Accipitridae	<i>Pandion cristatus</i>	Eastern Osprey	V	M, B	4	Found in littoral and coastal habitats and terrestrial wetlands. They generally are found in coastal areas though will travel inland along major water courses. They visit a wide range of wetland habitats including inshore waters, reefs, bays, coastal cliffs, estuaries, mangrove swamps, broad rivers, reservoirs, large lakes, and water holes. They feed on fish over clear, open water, and nest in trees or dead trees, generally within one kilometre of the ocean.	Unlikely to occur. No suitable aquatic habitats or native vegetation within the Subject Site.
Anatidae	<i>Stictonetta naevosa</i>	Freckled Duck	V	-	1	This species occurs primarily in south-eastern and south-western Australia and occurs as a vagrant elsewhere. It breeds in large, temporary swamps created during flood events in the Bulloo and Lake Eyre's basins and along the Murray-Darling river system. During inland droughts the species disperses to wetlands in the Murray River basin, and occasionally to coastal areas. The species prefers permanent freshwater swamps and creeks heavy with	Unlikely to occur. No suitable aquatic habitats or native vegetation within the Subject Site.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						shrub, sedge, and rush growth. It rests in dense cover during the day, usually in deep water and feeds at dusk and dawn on algae, seeds, and vegetative parts of aquatic sedges and grasses. It nests generally during October to December in dense vegetation near to the water level.	
Apodidae	<i>Hirundapus caudacutus</i>	White-throated Needletail		M, C, J, K	23	Species is almost exclusively aerial, and is found commonly overhead of wooded areas and heathland. Is less commonly found overhead of grassland and swamps.	Unlikely to occur. This species is exclusively aerial and is predominately found hovering over native vegetation, and not urban habitats devoid of vegetation.
Ardeidae	<i>Botaurus poiciloptilus</i>	Australasian Bittern	E1	E	7	Occurs in freshwater wetlands, and more rarely, estuarine wetlands. It favours wetlands with tall, dense vegetation, and forages in shallow water up to a depth of 0.3m. It nests in deep vegetative cover over shallow pools.	Unlikely to occur. No suitable aquatic habitats or native vegetation within the Subject Site.
Ardeidae	<i>Ixobrychus flavicollis</i>	Black Bittern	V	-	3	Inhabits terrestrial and estuarine wetlands, generally in areas containing permanent water and dense vegetation. The species can occur in flooded grassland, woodland, rainforest, and mangroves. It feeds on frogs, reptiles, fish, and invertebrates such as snails, dragonflies, shrimp, and crayfish. It roosts during the day on the ground amongst dense reeds or within trees. It nests in branches	Unlikely to occur. No suitable aquatic habitats or native vegetation.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						overhanging water.	
Artamidae	<i>Artamus cyanopterus cyanopterus</i>	Dusky Woodswallow	V	-	18	Occurs from Atherton Tableland in Queensland, down to Tasmania and west to the Eyre Peninsula in South Australia. In NSW it occurs from the coast to the western slopes of the Great Dividing Range and farther west. It breeds primarily on the western slopes of the Great Dividing Range in woodland and open dry forest. The species often occurs in eucalypt woodland and forest, though is also found in shrubland and heathland. It forages both above and below the canopy primarily for invertebrates, though will occasionally consume nectar, fruit, and seed.	Unlikely to occur. Not suitable native vegetation communities.
Cacatuidae	<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo	V	-	2	Occurs within a variety of forest and woodland types. Usually frequents forested areas with old growth attributes required for nesting and roosting purposes. Also utilises less heavily timbered woodlands and urban fringe areas to forage, but appears to favour well timbered country through which it habitually flies as it moves about.	Unlikely to occur. No forested or woodland areas within the Subject Site.
Cacatuidae	<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo population in the Hornsby and Ku-ring-gai Local Government	E2, V	-	2	Occurs within a variety of forest and woodland types. Usually frequents forested areas with old growth attributes required for nesting and roosting purposes. Also utilises less heavily timbered woodlands and urban fringe areas to forage, but appears to favour well timbered country through which it habitually flies as it moves about.	Unlikely to occur. No forested or woodland areas within the Subject Site.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
Areas							
Cacatuidae	<i>Calyptrorhynchus lathamii</i>	Glossy Black Cockatoo	V	-	1	Inhabits open forest and woodlands of the coast and the Great Dividing Range up to 1000 m ASL in which stands of She-Oak species, particularly Black She-oak (<i>Allocasuarina littoralis</i>), Forest She-oak (<i>A. torulosa</i>) or Drooping She-oak (<i>A. verticillata</i>) occur.	Unlikely to occur. No forested or woodland areas within the Subject Site.
Charadriidae	<i>Charadrius leschenaultii</i>	Greater Sand-plover	V	V,C,J,K	1	Breeds in the northern hemisphere and annually migrates to the southern hemisphere to feeding grounds summer. During summer in Australia it is widespread through the continent, though predominately occurs in north-western Australia. Most records in NSW are from the Clarence and Richmond estuaries. It is restricted to coastal areas, occurring mainly on sheltered sandy, shelly, or muddy beaches or estuaries. It roosts during high tide on beaches and shores and forages at low tide away from the edge of the water on wet ground. It feeds on insects, crustaceans, worms, and molluscs.	Unlikely to occur. No beaches or shoreline habitat within the Subject Site.
Columbidae	<i>Ptilinopus superbus</i>	Superb Fruit-Dove	V	-	1	Inhabits rainforest and closed forests where it forages high in the canopy, preferring figs and palms. Occasionally occurs in eucalypt or acacia woodland where fruit-bearing trees are present.	Unlikely to occur. No rainforest or closed forest within the Subject Site.
Falconidae	<i>Falco subniger</i>	Black Falcon	V	-	1	This species is widely distributed across Australia and is associated with a number of different vegetation communities. It is not found in heavily forested areas. The species commonly utilises wooded watercourses, and it	Unlikely to occur. No suitable native vegetation communities within

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						is usually associated with wetlands and streams. The species generally nests in intact, riparian woodland remnants with a diverse array of avian prey.	the Subject Site.
Laridae	<i>Sternula albifrons</i>	Little Tern	E1	C,J,K	6	Migratory bird which spends part of the year in eastern Asia and breeds in the north, east, and south-east Australian coasts from Shark Bay in Western Australia to the gulf of St Vincent in South Australia. Within NSW it occurs mainly north of Sydney, although occurs in small numbers south to Victoria. It is an almost exclusively coastal species, preferring sheltered environments, though has been known to occur several kilometres from the sea in harbours, inlets, and rivers. It nests in small colonies in low dunes or on sandy beaches above the high tide mark.	Unlikely to occur. No suitable coastal environments as Subject Site is entirely concreted.
Meliphagidae	<i>Anthochaera phrygia</i>	Regent Honeyeater	E4A	CE	5	Inhabits dry open forest and woodland, particularly Box-Ironbark woodland, and riparian forests of River Sheoak. These woodlands have significantly large numbers of mature trees, high canopy cover and abundance of mistletoes. Every few years non-breeding flocks are seen foraging in flowering coastal Swamp Mahogany and Spotted Gum forests, particularly on the central coast and occasionally on the upper north coast. The Regent Honeyeater is a generalist forager, which mainly feeds on the nectar from a wide range of eucalypts and mistletoes. Key eucalypt species include Mugga Ironbark, Yellow Box, Blakely's Red Gum, White Box and Swamp	Unlikely to occur. No forest or woodland habitats.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						Mahogany. Also utilises : E. microcarpa, E. punctata, E. polyanthemos, E. moluccana, Corymbia robusta, E. crebra, E. caleyi, Corymbia maculata, E. mckieana, E. macrorhyncha, E. laevopinea, and Angophora floribunda. Nectar and fruit from the mistletoes A. miquelii, A. pendula, A. cambagei are also eaten during the breeding season.	
Meliphagidae	<i>Epthianura albifrons</i>	White-fronted Chat	V	-	253	This is a gregarious species generally found foraging on bare or grassy ground in wetland areas, alone or in pairs. They feed on insects, mainly flies and beetle caught on the ground or close to. It occupies foothills and slopes up to 1000 m ASL, though in coastal areas is predominately found in areas of salt marsh, and occasionally in low shrubs bordering wetland areas.	Unlikely to occur. No suitable wetland habitats within the Subject Site.
Neosittidae	<i>Daphoenositta chrysoptera</i>	Varied Sittella	V	-	1	Inhabits eucalypt forests and woodlands, especially those containing rough-barked species and mature smooth-barked gums with dead branches, mallee, and Acacia woodland.	Unlikely to occur. No suitable native vegetation communities within the Subject Site.
Petroicidae	<i>Petroica boodang</i>	Scarlet Robin	V	-	2	Lives in mature and regrowth dry eucalypt forests and woodlands. Occasionally found in mallee, or wetter forests, or in wetlands and tea-tree swamps. The understorey is usually open and grassy with few scattered shrubs. Habitat usually contains abundant logs and fallen timber. It breeds on ridges, hills and foothills of the Great Dividing Range, Western Slopes, and in eastern coastal	Unlikely to occur. No suitable native vegetation communities within the Subject Site.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						regions. The species predominately inhabits forests and woodlands though some individuals may disperse to more open habitats following breeding. In Autumn and Winter the predominate habitat is open grassy woodlands, grasslands, or grazed paddocks with scattered trees. Birds pounce on insects and other invertebrates from low perches, though occasionally forage in the shrub and canopy layer.	
Petroicidae	<i>Petroica phoenicea</i>	Flame Robin	V	-		Breeds in upland tall moist eucalypt forests and woodlands, often on ridges and slopes. Prefers clearings or areas with open understoreys. Ground layer of the breeding habitat is dominated by native grasses with shrub layer either sparse or dense. Often nests near the ground and are built in sheltered sites e.g. shallow cavities in trees, stumps, or banks.	Unlikely to occur. No suitable native vegetation communities within the Subject Site.
Psittacidae	<i>Glossopsitta pusilla</i>	Little Lorikeet	V	-	9	Forages mostly in the canopy of open Eucalyptus forest and woodland, on Eucalypt species, and species of Angophora, Melaleuca, and other trees. Riparian habitats are ideal for the species due to higher productivity of flowering feed species. Isolated trees in paddocks and roadside remnants, along with urban trees can help sustain populations of the species. The species roosts in tree tops, often some distance from food trees, though prefers to nest in close proximity to feed areas. The species nests in hollows with a small entrance (3 cm) and at a height of between two and fifteen metres. Often nest	Unlikely to occur. No suitable native vegetation communities within the Subject Site.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						trees are in riparian areas, and include trees of species like <i>Allocasuarina</i> spp.	
Psittacidae	<i>Lathamus discolor</i>	Swift Parrot	E1	E	13	Migrates to the Australian south-east mainland between March and October. On the mainland they occur in areas where eucalypts are flowering profusely or where there are abundant lerp (from sap-sucking bugs) infestations.	Unlikely to occur. No eucalypts present within the Subject Site
Psittacidae	<i>Neophema pulchella</i>	Turquoise Parrot	V	-	1	Species lives on the edge of eucalypt woodland adjoining clearings, timbered ridges, and creeks in farmland. In generally occurs in pairs or small groups. It prefers to feed in tree shade and spends the majority of the day foraging for seed of grasses and forbs, or browsing on vegetation. Nests in tree hollows, logs, or posts, from August to December.	Unlikely to occur. No suitable native vegetation communities within the Subject Site.
Rostratulidae	<i>Rostratula australis</i>	Australian Painted Snipe	E	E M	3	Inhabits fringes of shallow inland wetlands, swamps, dams, and nearby marshy areas where there is a cover of grasses, lignum, low scrub, or open timber.	Unlikely to occur. No suitable native vegetation communities within the Subject Site.
Scolopacidae	<i>Calidris ferruginea</i>	Curlew Sandpiper	E	CE,C,J,K	338	Occurs around coastal areas and is widespread inland. The species occupies mainly intertidal mudflats in sheltered coastal areas, such as estuaries, bays, inlets and lagoons, and around non-tidal swamps. They forage for invertebrates at the edges of shallow waters. The species generally roosts in dunes and sandy areas.	Unlikely to occur. No beaches or shoreline habitat within the Subject Site.
Scolopacidae	<i>Limicola</i>	Broad-billed	V	C, J, K	1	Inhabits NSW during its non-breeding season and occurs	Unlikely to occur. No

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
	<i>falcinellus</i>	Sandpiper				in coastal areas from Ballina to Shoalhaven Heads. Preferred habitat is within sheltered areas of the coast including estuarine mudflats, salt marshes, freshwater lagoons, and sewerage farms.	suitable coastal environments as Subject Site is entirely concreted.
Scolopacidae	<i>Limosa limosa</i>	Black-tailed Godwit	V,P	C,J,K	10	Breeds in the Northern Hemisphere and migrates south for summer. Largest populations in Australia are on the north coast. Generally sporadic through the rest of the country including some inland records, though predominately found in coastal areas. It forages on the shores of intertidal mud and sand flats, banks of mud, sand, or shell-grit, and along the shores of inland lakes and other wetlands. They roost on banks of sand, mud, and shell, along with beaches in sheltered areas, and salt flats behind mangroves, and occasionally among low vegetation such as saltmarsh.	Unlikely to occur. No suitable coastal environments as Subject Site is entirely concreted.
Scolopacidae	<i>Numenius madagascariensis</i>	Eastern Curlew	P	CE,C,J,K	28	Breeds in the Northern Hemisphere and spends the non-breeding season in all states of Australia in coastal areas and rarely inland. In NSW it is distributed along all coastal areas but it mainly found in estuaries such as the Hunter River, Port Stephens, Clarence River and Richmond River. It occupies lakes, inlets, bays, and estuarine habitat. It is mainly found in intertidal mudflats and sometimes saltmarsh. It forages at the edge of shallow water and roosts on sandy spits and islets especially on dry beach sand.	Unlikely to occur. No beaches or shoreline habitat within the Subject Site.
Scolopacidae	<i>Xenus cinereus</i>	Terek	V,P	C,J,K	1	Breeds in the Northern Hemisphere. In the non-breeding	Unlikely to occur. No

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
		Sandpiper				season within Australia it is most common in northern Australia. The two main sites it occurs in NSW are the Richmond River and Hunter River estuaries. It occurs on coastal mudflats, lagoons, creeks, and estuaries. It favours mud and sand banks near mangroves, but is also recorded around rocky pools and reefs and occasionally up to 10km inland around brackish pools. It roosts amongst mangroves or dead trees, and forages in intertidal areas.	suitable coastal habitats as Subject Site is entirely concreted.
Strigidae	<i>Ninox connivens</i>	Barking Owl	V	-	4	Inhabits eucalypt woodland, open forest, swamp woodlands and, especially in inland areas, timber along watercourses. Denser vegetation is used occasionally for roosting. Nests in hollows of large, old eucalypts. Hunts small arboreal mammals such as Squirrel Gliders and Ringtail Possums, but when loss of tree hollows decreases these prey populations it becomes more reliant on birds, invertebrates, and terrestrial mammals. Requires very large permanent territories in most habitats due to sparse prey densities.	Unlikely to occur. No suitable native vegetation communities within the Subject Site.
Strigidae	<i>Ninox strenua</i>	Powerful Owl	V	-	169	The Powerful Owl requires large tracts of forest or woodland habitat but can occur in fragmented landscapes as well. It breeds and hunts in open or closed sclerophyll forests or woodlands and occasionally hunts in open habitats. Roosting during the day time occurs in dense vegetation of Eucalypts and species such as <i>Syncarpia glomulifera</i> (Turpentine), <i>Angophora</i>	Unlikely to occur. No suitable woodland or forests within the Subject Site.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						<p>floribunda (Rough-barked Apple), and other species. Prey species are medium-sized arboreal mammals such as the Greater Glider, Common Ringtail Possum, and Sugar Glider. As most prey species require hollows and a shrub layer these are important habitat components also of the Powerful Owl. Nests are in large tree hollows (at least 0.5 m deep), in large eucalypts (diameter at breast height of 80-240 cm) that are at least 150 years old.</p>	
Tytonidae	<i>Tyto longimembris</i>	Eastern Grass Owl	V	-	2	<p>The Eastern Grass Owl occurs in all mainland states of Australia but is most common in northern and north-eastern Australia. In NSW they mostly occur in the north-east. They occur in areas of tall grass, including grass tussocks in swampy areas, grassy plains, swampy heath, and in cane grass or sedges within flood plains. They rest in the day in a trampled platform in a large tussock or heavy undergrowth called a 'form'. The species always breeds on the ground, with nests found in trodden grass and frequently accessed by tunnels through vegetation. Most nesting occurs in autumn or winter though varies with environmental condition.</p>	Unlikely to occur. No suitable grassland habitats within the Subject Site.
Tytonidae	<i>Tyto novaehollandiae</i>	Masked Owl	V	-	2	<p>Roosts and breeds in moist eucalypt forested gullies, using large tree hollows or sometimes caves for nesting. Lives in dry eucalypt forests and woodlands from sea level to 1100 m. A forest owl, but often hunts along the edges of forests, including roadsides. The typical diet consists of tree-dwelling and ground mammals,</p>	Unlikely to occur. No forested gullies within the Subject Site.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
especially rats.							
Gastropoda							
Camaenidae	<i>Meridolum corneovirens</i>	Cumberland Plain Land Snail	E1	-	2	Primarily inhabits Cumberland Plain Woodland (an endangered ecological community). This community is a grassy, open woodland with occasional dense patches of shrubs. Lives under litter of bark, leaves and logs, or shelters in loose soil around grass clumps. Occasionally shelters under rubbish.	Unlikely to occur. No Cumberland Plain Woodland within the Subject Site.
Camaenidae	<i>Pommerhelix duralensis</i>	Dural Land Snail	-	E	27	Inhabits areas that are between shale-derived and sandstone-derived soils with forested vegetation that have good native cover and woody debris. Species prefers sheltering under rocks, inside curled-up bark and underneath leaf litter and light woody debris.	Unlikely to occur. No suitable forested vegetation within the Subject Site.
Mammalia							
Dasyuridae	<i>Dasyurus maculatus</i>	Spotted-tailed Quoll	V	E	2	Occurs in wide variety of habitats; rainforest, open forest, woodland, coastal heath, and riparian forest. Uses hollows in trees, logs, and rock crevasses as den sites. Females have a large home range of 200-500 hectares and males a larger range of 500-4000 hectares.	Unlikely to occur. No suitable forested vegetation within the Subject Site.
Emballonuridae	<i>Saccolaimus flaviventris</i>	Yellow-bellied Sheath-tail-bat	V	-	9	Roosts singly or in groups of up to six, in tree hollows and buildings; in treeless areas they are known to utilise mammal burrows. When foraging for insects, flies high and fast over the forest canopy, but lower in more open country. Forages in most habitats across its very wide range, with and without trees; appears to defend an aerial	Unlikely to occur. No native vegetation within Subject Site. Site sheds and shipping containers do not have suitable

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						territory.	entry points for microbats. Roosting is not possible underneath shipping containers as they are regularly moved.
Phascolarctidae	<i>Phascolarctos cinereus</i>	Koala	V	V	2	Inhabits eucalypt woodlands and forests, feeding on the leaves of Eucalyptus species. They feed on the foliage of more than 70 Eucalypt species and 30 non-eucalypt species.	Unlikely to occur. No woodlands or forests within the Subject Site.
Pseudocheiridae	<i>Petauroides volans</i>	Greater Glider		V	1	Restricted to eastern Australia, and occurring from the Windsor Tableland in Queensland south to Wombat State Forest in central Victoria. Largely restricted to eucalypt forests and woodlands. The diet is predominately comprised of eucalypt leaves, and more rarely flowers. Highest abundances occur in tall montane forests with old trees and abundant hollows.	Unlikely to occur. No woodlands or forests within the Subject Site.
Pteropodidae	<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	V	V	517	Occur in subtropical and temperate rainforests, tall sclerophyll forests and woodlands, heaths, and swamps as well as urban gardens and cultivated fruit crops. Commonly found in gullies, close to water, in vegetation with a dense canopy.	Unlikely to occur. Although species commonly forages in urban areas and on planted garden vegetation, woody species within the site are limited to a single <i>Olea europaea</i>

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
							subsp. <i>cuspidata</i> individual.
Vespertilionidae	<i>Falsistrellus tasmaniensis</i>	Eastern False Pipistrelle	V	-	4	Occurs in moist habitat with trees over 20m in height, hunting insects above or just below the tree canopy. Roosts in eucalypt hollows, under bark and in buildings	Unlikely to occur. No native vegetation within Subject Site. Site sheds and shipping containers do not have suitable entry points for microbats. Roosting is not possible underneath shipping containers as they are regularly moved.
Vespertilionidae	<i>Miniopterus australis</i>	Little Bent-winged bat	V	-	1	Inhabits moist eucalypt forest, rainforest, wet and dry sclerophyll forest, melaleuca swamps, dense coastal forests, and banksia scrub, preferring well timbered areas. Species roosts in caves, tunnels, tree hollows, stormwater drains, culverts, bridges and sometimes in buildings.	Unlikely to occur. No native vegetation within Subject Site. Site sheds and shipping containers do not have suitable entry points for microbats. Roosting is not possible underneath shipping containers as they are regularly moved.

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
Vespertilionidae	<i>Miniopterus orianae oceanensis</i>	Large Bent-winged Bat	V	-	83	Roosts mainly in caves but also in tunnels, mines, or buildings. Non-breeding populations disperse within a 300 km range of maternity caves. Hunting for moths and other insects takes place in forested areas above the canopy.	Unlikely to occur. No native vegetation within Subject Site. Site sheds and shipping containers do not have suitable entry points for microbats. Roosting is not possible underneath shipping containers as they are regularly moved.
Vespertilionidae	<i>Myotis macropus</i>	Southern Myotis	V	-	32	Roosts close to water in caves, hollow-bearing trees, storm water channels, buildings, under bridges and in dense foliage. Forage over streams and pools catching insects and small fish. Known from a range of habitats close to water from lakes, small creeks to large lakes and mangrove lined estuaries	Unlikely to occur. No suitable roosting habitat within Subject Site.
Vespertilionidae	<i>Scoteanax rueppellii</i>	Greater Broad-nosed Bat	V	-	4	Found mainly in the gullies and river systems that drain the Great Dividing Range. Usually roosts in tree hollows and buildings. Forages after sunset, flying slowly and directly along creek and river corridors at an altitude of 3 - 6 m. Open woodland habitat and dry open forest suits the direct flight of this species as it searches for beetles and other large, slow-flying insects. Species is not known to occur in areas of high urban density.	Unlikely to occur. No native vegetation within Subject Site. Site sheds and shipping containers do not have suitable entry points for microbats. Roosting

Family	Scientific Name	Common Name	BC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
							is not possible underneath shipping containers as they are regularly moved. Species is not known to occur in highly urbanised areas.

Table Key: V = Vulnerable, E = Endangered, E1 = Endangered, E2 = Endangered Population, E4A – Critically Endangered, CE = Critically Endangered, C = Listed on China Australia Migratory Bird Agreement, J = Listed on Japan Australia Migratory Bird Agreement, K = Listed on Republic of Korea Australia Migratory Bird Agreement, M = Marine Species

Table 3 Likelihood of Occurrence - Threatened Flora Species

Family	Scientific Name	Common Name	TSC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
Campanulaceae	<i>Wahlenbergia multicaulis</i>	Tadgell's Bluebell in the local government areas of Auburn, Bankstown, Baulkham Hills, Canterbury, Hornsby, Parramatta, and Strathfield	E2	-	8	There are 13 known sites, two of which are in northern Sydney (Thornleigh and Mt Ku-Ring-Gai) with the remainder in western Sydney (Rookwood, Chullora, Bass Hill, Bankstown, Georges Hall, Campsie, South Granville, and Greenacre). In Western Sydney most sites occur on the Villawood Soil Series, a soil landscape comprising tertiary alluviums permeated with ironstone laterite. In Hornsby the species is associated with the Hawkesbury soil landscape. In Hornsby the species occurs in or adjacent to Sandstone Gully Forest, and in Western Sydney it occurs in Cooks River/Castlereagh Ironbark Forest. It is found variously in forest, woodland, scrub, grassland, and the edges of watercourses and wetlands, typically in damp disturbed sites. It generally flowers throughout the year.	Unlikely to occur. Although species is able to persist in somewhat degraded habitats there is only minor areas of dirt along the eastern edge of the site, and grassland areas in the south are mown. The species was not recorded during the survey despite searches of all habitat within the Subject Site. The Subject Site is not within one of the suburbs with any of the 13 known sites.

Family	Scientific Name	Common Name	TSC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
Convolvulaceae	<i>Wilsonia backhousei</i>	Narrow-leaved Wilsonia	V	-	127	Species occurs scattered along the east coast reaching a northern limit at Wamberal Lagoon. Found in intertidal saltmarshes and more rarely on sea cliffs. It typically forms pure, matted stands over small areas where it occurs.	Unlikely to occur. No intertidal areas or sea cliffs within the Subject Site. Subject Site is not in the same suburb as any of the known locations.
Ericaceae (Epacridoideae)	<i>Epacris purpurascens</i> var. <i>purpurascens</i>		V	-	45	<i>Epacris purpurascens</i> var. <i>purpurascens</i> occurs in sclerophyll forest, scrubs, and swamps, from Gosford and Sydney districts in the Central Coast botanical subdivision. It is found in a large array of habitat types, though mostly in areas with a strong shale influence.	Unlikely to occur. No areas of native vegetation communities remain within the Subject Site and species is a conspicuous shrub that was not located during surveys.
Fabaceae (Faboideae)	<i>Dillwynia tenuifolia</i>		V	-	1	Locally abundant particularly within scrubby/dry heath areas within Castlereagh Ironbark Forest and Shale Gravel Transition Forest on tertiary alluvium or laterised clays. May also be common in transitional areas where these communities adjoin Castlereagh Scribbly Gum Woodland.	Unlikely to occur. No areas of native vegetation communities remain within the Subject Site and species is a conspicuous shrub that was not located during surveys.
Fabaceae (Mimosoideae)	<i>Acacia clunies-rossiae</i>	Kanangra Wattle	V		1	This species occurs within the Kowmung and Coxs River areas	Unlikely to occur. No areas of native vegetation

Family	Scientific Name	Common Name	TSC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						within Kanangra-Boyd and Blue Mountains National Park. The species is found in dry sclerophyll forest on skeletal soils on rocky slopes, predominately comprised of shale and granite, and also in gravel and alluvium along creeks.	communities remain within the Subject Site and species is a conspicuous shrub that was not located during surveys.
Fabaceae (Mimosoideae)	<i>Acacia pubescens</i>	Downy Wattle	V	V	23	Occurs on alluviums, shales and at the intergrade between shales and sandstones. Occur in open woodland and forest, including Cooks River/Castlereagh Ironbark Forest, Shale/Gravel Transition Forest, and Cumberland Plain Woodland.	Unlikely to occur. No areas of native vegetation communities remain within the Subject Site and species is a conspicuous shrub that was not located during surveys.
Myrtaceae	<i>Callistemon linearifolius</i>	Netted Bottle Brush	V	-	2	In the Sydney area it has been recorded from Georges River to the Hawkesbury River, and occurs northwards to Nelson Bay. It grows in dry sclerophyll forest close to the coast and in adjacent ranges.	Unlikely to occur. No areas of native vegetation communities remain within the Subject Site and species is a conspicuous shrub that was not located during surveys.
Myrtaceae	<i>Syzygium paniculatum</i>	Magenta Lilly Pilly	E1	V	5	Species occurs naturally from Forster in the north to Jervis Bay in the south. It is found in rainforest on sandy soils or on sand dunes at	Unlikely to occur. No areas of native vegetation communities remain within the Subject Site and

Family	Scientific Name	Common Name	TSC Act	EPBC Act	Records	Habitat Requirements	Likelihood of Occurrence
						low altitude in coastal areas. It is most commonly associated with littoral and gallery rainforest types. The species is extensively cultivated as an ornamental plant.	species is a conspicuous small tree that was not located during surveys.
Potamogetonaceae	<i>Zannichellia palustris</i>	Horned Pondweed	E1	-	6	Grows in fresh or slightly saline, stationary, or slowly flowing water. In NSW it is only known from the Hunter Region in the Lower Hunter and Sydney Olympic Park. Flowers during the warmer months of the year.	Unlikely to occur. No aquatic habitats within the Subject Site.
Rhamnaceae	<i>Pomaderris prunifolia</i>	P. prunifolia in the Parramatta, Auburn, Strathfield, and Bankstown Local Government Areas	E1	-	5	This listing is for an endangered population which occurs in the Parramatta, Auburn, Strathfield, and Bankstown Local Government Areas. Within these areas it has only been recorded recently at Rydalmere. It occurs in association with creeks on sandstone and in gullies on shale soils.	Unlikely to occur. No areas of native vegetation communities remain within the Subject Site and species is a conspicuous shrub that was not located during surveys.

Table Key: V = Vulnerable, E = Endangered, E1 = Endangered, E2 = Endangered Population, E4A – Critically Endangered, CE = Critically Endangered

APPENDIX C :

Flora Species Recorded in and Adjacent to the Subject Site

Table 4 Flora Species Recorded within and adjacent to the Subject Site

BAM Growth Form Group	Family	Scientific Name	Common Name	Native	Exotic	High Threat Weed	Subject Site	Riparian Area to North-east
Tree (TG)	Acanthaceae	<i>Avicennia marina</i> var. <i>australasica</i>	Grey Mangrove	YES				X
Tree (TG)	Casuarinaceae	<i>Casuarina glauca</i>	Swamp Oak	YES				X
Exotic	Apiaceae	<i>Cyclospermum leptophyllum</i>	Slender Celery		YES		X	
Exotic	Apocynaceae	<i>Araujia sericifera</i>	Moth Vine		YES		X	
Exotic	Asteraceae	<i>Ageratina adenophora</i>	Crofton Weed		YES	No	X	
Exotic	Asteraceae	<i>Bidens pilosa</i>	Cobbler's Pegs		YES	No	X	
Exotic	Asteraceae	<i>Chrysanthemoides monilifera</i> subsp. <i>monilifera</i>	Boneseed		YES	No	X	
Exotic	Asteraceae	<i>Cirsium vulgare</i>	Spear Thistle		YES		X	
Exotic	Asteraceae	<i>Conyza sumatrensis</i>	Tall fleabane		YES		X	
Exotic	Asteraceae	<i>Hypochaeris radicata</i>	Catsear		YES		X	
Exotic	Asteraceae	<i>Lactuca saligna</i>	Willow-leaved Lettuce		YES		X	
Exotic	Asteraceae	<i>Lactuca serriola</i>	Prickly Lettuce		YES		X	
Exotic	Asteraceae	<i>Sonchus asper</i>	Prickly Sowthistle		YES		X	
Exotic	Asteraceae	<i>Sonchus oleraceus</i>	Common Sowthistle		YES		X	
Exotic	Asteraceae	<i>Taraxacum officinale</i>	Dandelion		YES		X	
Exotic	Brassicaceae	<i>Brassica rapa</i>	Turnip		YES		X	

BAM Growth Form Group	Family	Scientific Name	Common Name	Native	Exotic	High Threat Weed	Subject Site	Riparian Area to North-east
Exotic	Euphorbiaceae	<i>Euphorbia peplus</i>	Petty Spurge		YES		X	
Exotic	Fabaceae (Faboideae)	<i>Medicago polymorpha</i>	Burr Medic		YES		X	
Exotic	Fabaceae (Faboideae)	<i>Melilotus indica</i>	Hexham Scent		YES		X	
Exotic	Fabaceae (Faboideae)	<i>Trifolium repens</i>	White Clover		YES		X	
Exotic	Fabaceae (Faboideae)	<i>Vicia sativa</i>	Common vetch		YES		X	
Exotic	Lauraceae	<i>Cinnamomum camphora</i>	Camphor Laurel		YES	YES	X	
Exotic	Malvaceae	<i>Modiola caroliniana</i>	Red-flowered Mallow		YES		X	
Exotic	Moraceae	<i>Morus alba</i>	White Mulberry		YES			X
Exotic	Oleaceae	<i>Ligustrum lucidum</i>	Large-leaved Privet		YES	No		X
Exotic	Oleaceae	<i>Olea europaea</i> subsp. <i>cuspidata</i>	African Olive		YES		X	
Exotic	Plantaginaceae	<i>Plantago lanceolata</i>	Lamb's Tongues		YES		X	
Exotic	Poaceae	<i>Bromus catharticus</i>	Prairie Grass		YES		X	
Exotic	Poaceae	<i>Cenchrus clandestinus</i>	Kikuyu Grass		YES	No	X	X
Exotic	Poaceae	<i>Chloris virgata</i>	Feathertop Rhodes Grass		YES		X	
Exotic	Poaceae	<i>Cortaderia selloana</i>	Pampas Grass		YES	YES	X	
Exotic	Poaceae	<i>Eragrostis curvula</i>	African Lovegrass		YES	No	X	
Exotic	Poaceae	<i>Lolium perenne</i>	Perennial Ryegrass		YES		X	
Exotic	Poaceae	<i>Melinis repens</i>	Red Natal Grass		YES		X	
Exotic	Poaceae	<i>Poa annua</i>	Winter Grass		YES		X	



BAM Growth Form Group	Family	Scientific Name	Common Name	Native	Exotic	High Threat Weed	Subject Site	Riparian Area to North-east
Exotic	Verbenaceae	<i>Verbena bonariensis</i>	Purpletop		YES		X	
Exotic	Poaceae	<i>Cynodon dactylon</i>	Common Couch		YES		X	

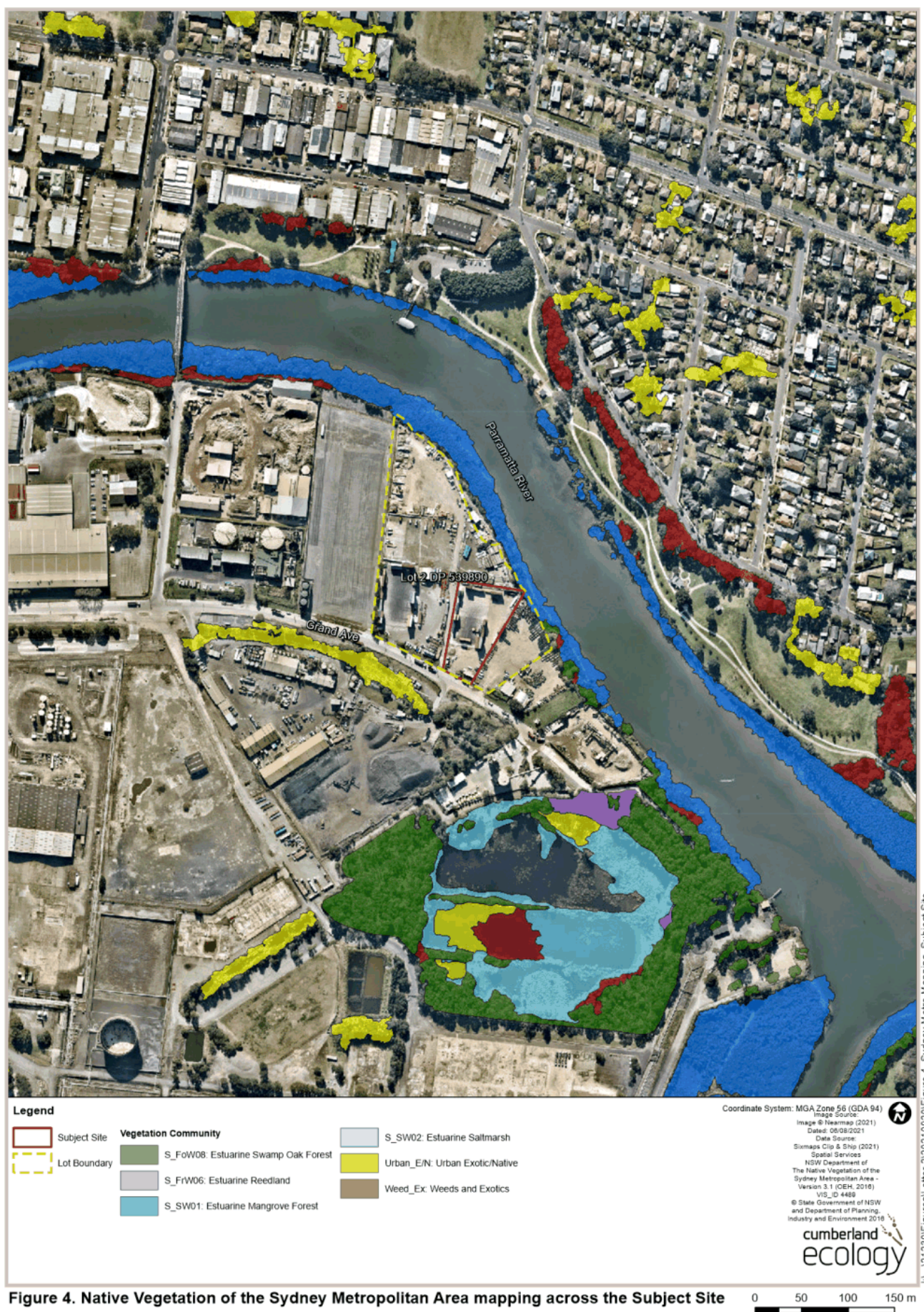
FIGURES











XINNOVATIVE

15 MARCH 2022

6.1	Planning Proposal - 180 and 180D George Street Parramatta	488
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INNOVATIVE

ITEM NUMBER	6.1
SUBJECT	Planning Proposal - 180 and 180D George Street Parramatta
REFERENCE	RZ/1/2022 -
APPLICANT/S	Karimbla Properties (No.13) Pty Ltd
OWNERS	Karimbla Properties (No.13) Pty Ltd
REPORT OF	Senior Project Officer Land Use

DEVELOPMENT APPLICATIONS CONSIDERED BY SYDNEY CENTRAL CITY PLANNING PANEL

DA/480/2018 determined 16 October 2019: Construction of 2 mixed use towers (57 and 66 storeys) comprising 767 residential units, 216 serviced apartments, 2,329sqm of retail floor space, a child care centre, a commercial gymnasium, and 5 basement levels, public domain upgrades including pedestrian through-site link.

PURPOSE

The purpose of this report is to seek advice from the Local Planning Panel on a Planning Proposal for land located at 180 and 180D George Street, Parramatta.

RECOMMENDATION

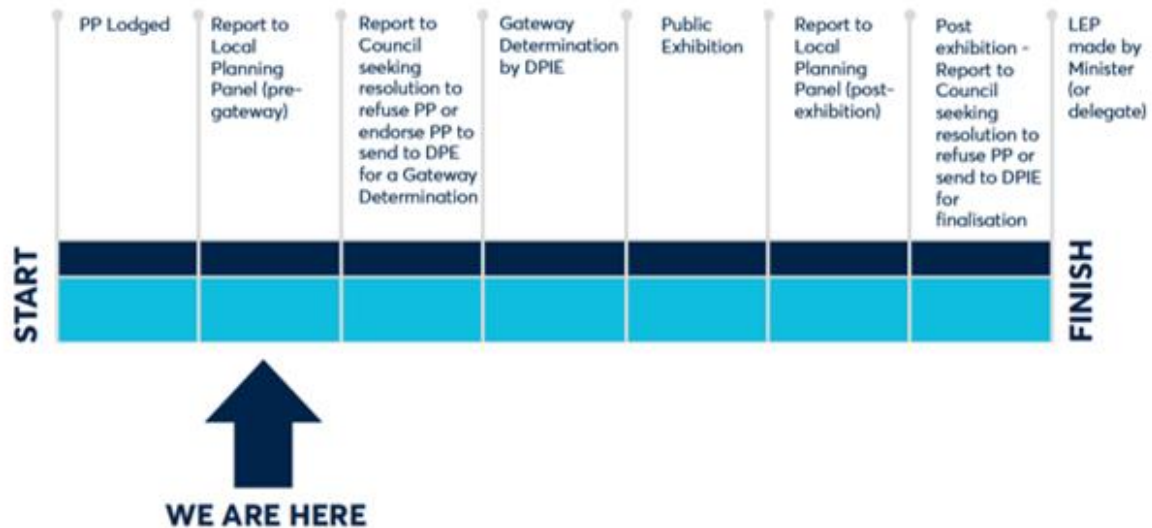
The Local Planning Panel in its advice to Council consider the following recommendation:

That Council does not support, for the purposes of seeking a Gateway Determination, the Planning Proposal at **Attachment 1** for land at 180 and 180D George Street, Parramatta which seeks to amend clause 7.12(2) of the Parramatta Local Environmental Plan 2011 to reduce the minimum floor space ratio for defined non-residential land uses from 1:1 to 0.43:1, for the following reasons:

- a) The Planning Proposal is inconsistent with Council's endorsed policy position to increase non-residential land uses within the Parramatta CBD.
- b) Reduction of the 1:1 commercial floorspace requirement for the subject site may set a precedent for further removal of employment generating land uses in the Parramatta CBD.
- c) Serviced apartments will continue to support Parramatta's long term economic activity and growth and there is insufficient evidence provided by the applicant to support the argument that short stay accommodation is not viable in the medium to long term.
- d) The location of the subject site is a competitive position for serviced apartments.
- e) Gradual removal of employment generating land uses risks the long-term economic growth of Parramatta City Centre, including Parramatta's emergent visitor economy.
- f) The proposed conversion of serviced apartments to residential apartments may not result in increased retail spending, due to higher investor ownership patterns in the Parramatta CBD.
- g) The proposed conversion of serviced apartments to residential units do not demonstrate compliance with the Apartment Design Guide (ADG) of the State Environmental Planning Policy 65 (Residential Design Quality of Apartment Buildings) 2002.

Planning Proposal Timeline

(If the Planning Proposal was endorsed)



SITE DESCRIPTION

1. The subject site is located at 180 and 180D George Street, Parramatta on the north-eastern corner of the intersection of George Street and Charles Street at the eastern end of the Parramatta Central Business District (CBD). Refer **Figure 1**.
2. The site is an irregular shaped lot and has a combined area of 7,978.5sqm. The site has a primary south-facing frontage to George Street, primary west-facing frontage to Charles Street and a north/north-east rear boundary to the Parramatta River Foreshore Reserve. To the immediate east is a state listed heritage item and potential archaeological site, known as Harrisford (refer **Figure 1**).



Figure 1 – Location Map - 180 George Street Parramatta (subject site)

3. The western portion of the site is occupied by a 10-storey building which previously operated exclusively as Meriton Serviced Apartments. The building was approved for a change of use in 2018 (DA/480/2018) to operate as a mixed use development consisting of residential units and ground floor retail, restaurant and business premises.
4. The remainder of the site is under construction for a new mixed-use development comprising of two towers containing residential accommodation, serviced apartments, retail floor space, a child care centre, a gym and a five-level basement car park.

CURRENT PLANNING CONTROLS

5. The current planning controls for the site under the Parramatta Local Environmental Plan 2011 (PLEP 2011) are as follows (and shown in **Figures 2 – 7**):

- a. B4 Mixed Use Zone
- b. Maximum Floor Space Ratio of 10:1 (11.5:1 including design competition bonus)
- c. Maximum Height of Buildings of 190m (218.5m including design competition bonus)
- d. Additional local provision for the site that requires a minimum FSR of 1:1 be provided as employment generating floor space comprising of the following uses: commercial premises, tourist and visitor accommodation, centre based childcare facilities and serviced apartments.



Figure 2 – B4 Mixed Use Zone under PLEP 2011 as outlined in blue

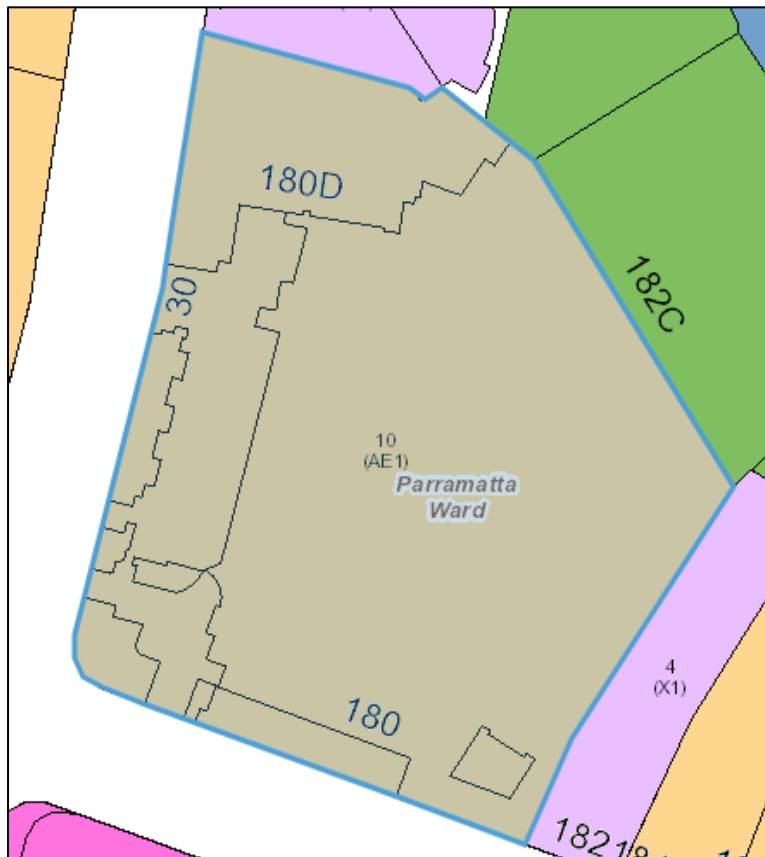


Figure 3 – Maximum Floor Space Ratio (10:1) under PLEP 2011 (11.5 including design competition bonus) as outlined in blue

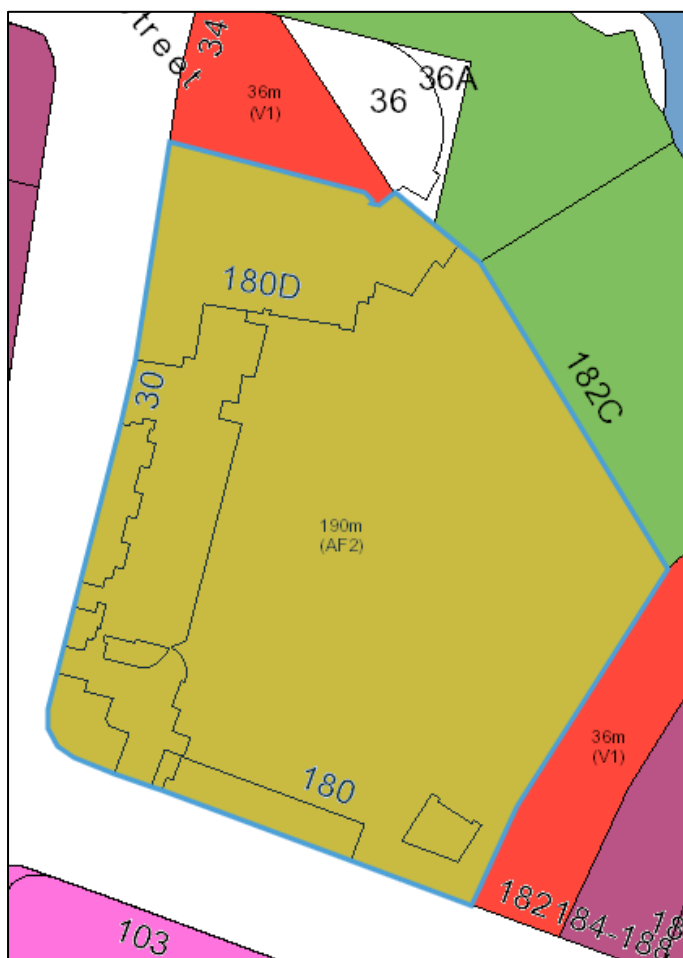


Figure 4 – Maximum Height of Building 190m under PLEP 2011 (218.5m including design competition bonus)

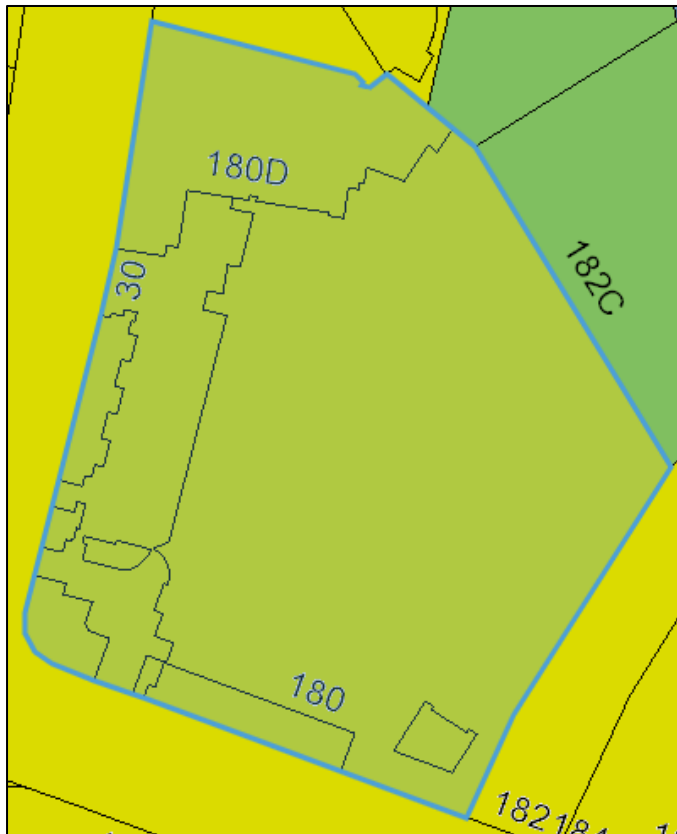


Figure 5 – Additional Local Provision Map (7.12) under PLEP 2011

BACKGROUND

6. In November 2015, the applicant lodged a planning proposal for the subject site, seeking amendments to site specific planning controls under the PLEP 2011. The proposed amendments were sought for the purposes of facilitating a new mixed use development at 180 George Street, Parramatta. The planning proposal requested:
 - a. An increase in the maximum FSR from 4:1 to 10:1.
 - b. An increase in building height from 36m to 180m.
7. On 11 April 2016, Council considered the planning proposal and endorsed its submission to the, then, Department of Planning, Industry and Environment (DPIE) for a Gateway Determination subject to certain changes. These involved:
 - a. Applying no height limit to the site, but to apply Clause 7.6 Airspace Operations to require consideration of Federal Government airspace provisions.
 - b. Imposing a site specific clause requiring a 1:1 commercial floorspace for future development.
8. The site specific clause requiring a 1:1 commercial floorspace originates from the Parramatta CBD Planning Strategy (endorsed on 27 April 2015). The Strategy states: *a minimum non-residential FSR of 1:1 must be achieved for all sites in the mixed use zone of the Parramatta CBD*. The policy objective of this control is to contribute employment generating floorspace consistent with Parramatta's role as a key employment centre in Western Sydney. The Parramatta CBD Planning Proposal (endorsed on 15 June 2021) reinforces this

approach as a policy position in the Parramatta LEP 2011 as part of its proposed amendments.

9. At the 11 April 2016 meeting, it was acknowledged that if the existing 10 storey building on the western portion of the site operating as Meriton Serviced Apartments were to be retained, the development would have difficulty in complying with the 1:1 commercial floorspace requirement. At the 11 April 2016 meeting, Council resolved to advise the owner of the site that it was Council's preference for this building to be demolished, noting the applicant could then more easily accommodate the commercial floorspace on the site. Demolition of the building was not proposed by the applicant.
10. The Planning Proposal was subsequently submitted to the then DPIE for a Gateway Determination, which was issued on 17 June 2016.
11. In October 2016, the applicant requested that Council seek a Gateway Determination Review to amend the wording of the site-specific commercial floorspace clause to include serviced apartments as a land use capable of satisfying the 1:1 requirement. The rationale for this request was that the existing 10 storey serviced apartment building could contribute to satisfying the clause, as the applicant's preference was to not demolish the building and retain it as part of the planned redevelopment of the site.
12. Under the Standard Instrument for local environmental plans, serviced apartments are defined as a land use under the group term 'tourist and visitor accommodation'. Serviced apartments are not defined under the group term 'commercial premises'. Therefore, neither the Parramatta CBD Planning Strategy nor the Parramatta CBD Planning Proposal had considered serviced apartments as a land use to satisfy the minimum 1:1 FSR provision.
13. On 19 December 2019, the matter was reported to Council with a recommendation to support the broadening of land uses under the clause to include serviced apartments. The Council officer recommendation was based on special circumstances that generated site specific merit for an amendment to be supported. The following reasons were put forward in that recommendation:
 - a. **Existing serviced apartments:** The serviced apartments were an existing element located on the western side of the site. They were still in good condition and due to their location, could operate separately to the proposed new development with minimal impacts and allow the remainder of the site to be redeveloped.
 - b. **Quantum of commercial floorspace provision including existing serviced apartments:** As noted above, Council's position at the time was to not include serviced apartments as a commercial use. This was based on serviced apartments being comparatively low employment generators compared to the floorspace they occupy. Notwithstanding this position, the quantum of commercial floorspace on the site would have amounted to 15,100sqm or 1.88:1 if calculated to include the existing serviced apartments, existing retail tenancies that were intended to be retained and the new ground floor retail tenancies that were proposed as part of the redevelopment. Altogether, a commercial floorspace of 1.88:1 would achieve almost double the minimum 1:1 requirement or 8,000sqm of employment generating floorspace required for the site.

- c. **Flood constraints:** Ideally the minimum 1:1 or 8,000sqm of commercial floorspace would have been delivered in the form of office space and business premises, however due to flooding constraints, the proposed layout of the development restricted the delivery of commercial floorspace to only small commercial suites sleeving the proposed car park in the buildings podium, making any substantial office space difficult to deliver on the site.
14. At the 19 December 2016 meeting, Council endorsed the Planning Proposal for submission to the then DPIE for a Gateway Determination review request. The recommendation endorsed in the report (and that formed part of the submission to the DPIE) noted that support for the request was heavily influenced by the fact that serviced apartments were an existing use on the site and they were likely to remain so in response to the applicant's desire to retain the building and their continued operation. On 10 January 2017 the then DPIE issued an alteration to the Gateway Determination approving the requested change.
15. The amended planning proposal was exhibited between 22 March – 21 April 2017. On 14 August 2017, Council resolved to endorse the proposed amendments to the PLEP 2011 in relation to the site. The amendments were finalised within the PLEP 2011 on 20 April 2018 and included:
- An increase to the maximum building height from 36m to 190m (218.5m including design competition bonus).
 - An increase to the FSR from 4:1 to 10:1 (11.5:1 including design competition bonus).
 - Applying a site specific provision that requires a minimum FSR of 1:1 be provided as employment generating floor space comprising of the following uses: commercial premises, tourist and visitor accommodation, centre based child care facilities and serviced apartments.
 - Require Clause 7.6 (Airspace Operations) to apply to the site.
16. Following the gazettal, the applicant lodged a development application seeking approval for the construction of a new mixed-use development on the site. This application was approved by the Sydney Central City Planning Panel under DA/480/2018 on 9 October 2018. This DA has been amended under multiple modifications during its development phase, including a focus on reducing the service apartment component of the development.
17. An overview of the development application history of the site relevant to the Planning Proposal is provided in **Table 1** below.

Table 1 – Development Application History - 180 George Street, Parramatta

DA reference	Description
DA/480/2018	Construction of 2 mixed use towers (57 and 66 storeys) comprising 767 residential units, 216 serviced apartments, 2,329sqm of retail floor space, a child care centre, a commercial gymnasium, and 5 basement levels containing space for a total of 640 cars, 188 bicycles; public domain upgrades including pedestrian through-site link. Approved 9 October 2019.
DA/513/2021	Part change of use from serviced apartments to residential units on Levels 31-42 in the approved South Tower, internal configuration changes to apartments on levels 31-42 in the south

DA reference	Description
	tower, resulting in a reduction of 12 units. Total number of serviced apartments 182. Approved 21 September 2021 The amendments resulted in a reduction of the total commercial FSR of the development to 2.03:1.
DA/789/2021	Part change of use to convert 122 serviced apartments to 122 residential units on Levels 13-39 of the southern tower. Approved 16 November 2021 The amendments resulted in a reduction of the total commercial FSR of the development to 1.02:1.

18. Based on the latest approval under DA/789/2021, the total non-residential FSR for the entire development is 1.02:1. This includes new and existing retail (total 2,414sqm), the childcare centre (598sqm), additional commercial floorspace provided to the development (totaling 380sqm) and 60 serviced apartments (4,801sqm). The 1.02:1 FSR for the development remains consistent with clause 7.12(2) of the PLEP 2011, that is provides a minimum 1:1 non-residential FSR requirement for the site.

DESCRIPTION OF PLANNING PROPOSAL

19. The objective of the Planning Proposal is to convert the remaining 60 serviced apartments to residential apartments, therefore reducing the total commercial floor space ratio of the site to 0.43:1. To facilitate this objective, the Planning Proposal seeks to amend Clause 7.12(2) of the PLEP 2011 that applies to the subject site. Clause 7.12(2) reads:
- (2) Despite clauses 4.4 and 7.2, the minimum floor space ratio for a building on land to which this clause applies that is used for any of the following purposes is 1:1 –*
- (a) Commercial premises,*
 - (b) Tourist and visitor accommodation,*
 - (c) Centre-based child care facilities,*
 - (d) Serviced apartments.*
20. The conversion of 60 serviced apartments to residential will result in a:
- a. Total residential gross floor area (GFA) of 87,971sqm (11.03:1 FSR)
 - b. Total non-residential gross floor area (GFA) of 3,492sqm (0.43:1 FSR)
21. The Planning Proposal therefore requests an amendment to Clause 7.12(2) to reduce the minimum FSR to 0.43:1.
22. It is noted that the proponent enquired about facilitating the conversion of serviced apartments to residential through a Clause 4.6 (Exception to Development Standards) application under the PLEP 2011. However, this was not accepted as the proposed conversion is inconsistent with Clause 7.12(2) and cannot be considered under Clause 4.6 of the PLEP 2011 as it significantly exceeds the 5% limit allowed for variations to development standards relating to floor space ratios (refer to Clause 4.6(8)(ca) of the PLEP 2011 and note the clause only applies to DAs not modifications).

PLANNING PROPOSAL ASSESSMENT

23. The Planning Proposal is accompanied by supporting evidence, including a 'Strategic Positioning Paper – 180 George Street, Parramatta' prepared by Urbis (November 2021) for Meriton (the proponent). The Strategic Positioning Paper is provided as **Attachment 2** to this report. Indicative Concept Plans for the proposed residential units were also submitted. These are provided as **Attachment 3** to this report.
24. The Strategic Positioning Paper presents the following key reasons to justify the Planning Proposal:
- a) Covid-19 has delivered the short stay accommodation industry a significant blow.
 - b) The Parramatta CBD has a large supply pipeline of hotels and serviced apartments.
 - c) The short stay accommodation sector is expected to experience a slow recovery from Covid-19 due to the increasing future supply.
 - d) The subject site has a relatively weak competitive positioning for serviced apartments.
 - e) The conversion will lead to a minimal loss of jobs and economic contribution to the local economy.
 - f) The conversion will generate an additional \$2.2 million in retail spending annually that will support existing and new businesses.
 - g) The serviced apartments cannot be converted into another employment generating use due to building constraints.
25. Council officers have assessed the Planning Proposal and recommend it not be supported, as it is inconsistent with the Parramatta CBD Planning Proposal, and was subject to prior concessions from Council in granting a broadening of the defined non-residential land uses under Clause 7.12(2). Council officers have considered each of the reasons provided in the Strategic Positioning Paper (**Attachment 2**) and conclude the Planning Proposal does not have sufficient strategic planning merit and should not be supported. The assessment is detailed under a range of key issues identified below.
- a) *Planning Proposal is inconsistent with Council's endorsed policy position to increase non-residential land uses within the Parramatta CBD.*
26. The Planning Proposal seeks to reduce the minimum commercial floor space provision for the site from 1:1 to 0.43:1.
27. Council's policy position is that a minimum floor space provision of 1:1 for commercial premises be provided for buildings on land zoned B4 Mixed Use surrounding the B3 Commercial Core. This is Council's long-standing strategic position, first expressed in the Parramatta City Centre Planning Framework Study (2014) and then the Parramatta CBD Planning Strategy adopted by Council on 27 April 2015. The requirement for minimum commercial floorspace became a formal policy position when it was included as a provision in the Parramatta CBD Planning Proposal adopted by Council on 15 June 2021.
28. The Parramatta CBD Planning Proposal recognises the importance of the B4 Mixed Use zoned land on the periphery of the B3 Commercial Core zone of the CBD to facilitate a range of commercial uses that will contribute to its long term

economic and jobs growth as Sydney's future Metropolitan Centre (Parramatta CBD Planning Proposal). This applies to the site at 180 George Street.

29. Specifically, encouraging more employment generating development in the B4 Mixed use zone has been of prime importance throughout the development of the Parramatta CBD Planning Proposal. Various incentives are included to enable additional commercial floor space to be provided in future development – for example, through the minimum 1:1 provision requirement as well as incentives for additional commercial floor space to be excluded from FSR requirements, where provided in development.

30. In this respect, the Planning Proposal is inconsistent with the endorsed policy position of the Parramatta CBD Planning Proposal and risks undermining the effectiveness of the policy direction even before the CBD Planning Proposal is finalised.

b) Commercial floorspace on the site is already at the minimum required amount. Further erosion of commercial floorspace is not supported nor necessary.

31. As noted earlier in the report, Council's decision in relation to the Planning Proposal finalised in 2017 to include serviced apartments as a land use capable of satisfying the minimum commercial floorspace provision was made on the understanding they would be retained as an existing use on the site. Further to the reasoning of that decision, was that the existing serviced apartments would contribute to almost double the commercial floorspace required under Council policy (1.88:1 FSR). Council Officers consider that including tourist and visitor accommodation within the definition of acceptable commercial uses on this site under Clause 7.12(2) is already a concession.

32. The progressive conversion of serviced apartments to residential either by modification to the original development consent or by subsequent consents has now been eroded to the absolute minimum. Any further variation to the commercial floorspace requirements of the site is not supported nor considered necessary as addressed in Council officer's responses to the proponent's reasons below.

c) Serviced apartment portfolio performed better in Parramatta compared to state and national levels.

33. The Strategic Positioning Paper asserts that the short stay accommodation sector has been significantly impacted by Covid-19, citing a dramatic drop in occupancy rates across Meriton's serviced apartment portfolio. The paper cites statistics demonstrating that occupancy rates in the Meriton Serviced Apartment portfolio were very healthy pre-Covid – 91% in Parramatta – compared to 88% in NSW and 87% nationally. Within the period impacted by Covid-19, the occupancy rate in Parramatta dropped by 33% (down to 58% for the first lockdown) and a 53% drop for the second lockdown (down to a recorded 38% occupancy rate), while occupancy rates in NSW and nationally dropped by 45% and 43% respectively in the first lockdown.

34. The Strategic Positioning Paper does not provide comparable information for the impacts of the second lockdown on its portfolio over the balance of NSW or

nationally so the comparable impact of the second lockdown cannot be ascertained. The statistics provided indicate however that, during the first lockdown at least, the serviced apartment portfolio was still quite resilient compared to NSW overall and nationally during the peak of the pandemic. It is possible that in the post-pandemic phase, the impact to short stay accommodation may resolve itself progressively as restrictions to movement are relaxed and community vaccination rates increase. Additionally, it is expected that serviced apartments will continue to support aspects of Parramatta's long term economic activity and growth. The function of serviced apartments in this context are discussed in the report further below.

d) Reducing the 1:1 commercial floorspace requirement for the subject site may set a precedent for further removal of employment generating land uses in the Parramatta CBD.

35. The Strategic Positioning Paper states that with the proposed pipeline of short term accommodation facilities within the Parramatta CBD, it is expected that supply in this sector will increase by 250% by 2027. In this context, the proponent asserts that the proposed conversion of the remaining 60 serviced apartments into residential will only result in a 3% decrease in total supply by 2027, thereby minimally impacting supply.
36. The removal of employment generating land uses in response to the short to medium term effects of Covid-19 risks may impact the long-term economic growth of the Parramatta CBD. Further consideration of the Planning Proposal may set a future precedent for other sites similarly affected to request variations to the minimum commercial floorspace requirement. Should this matter be considered across multiple sites in the CBD, this may not only affect the Parramatta CBD's critical success in transforming into one of metropolitan significance, but hamper its economic recovery in response to Covid-19.
37. The Strategic Positioning Paper also asserts that there is expected to be an oversupply of short-term accommodation units in 2030, taking into account existing short term accommodation developments in the pipeline. Council officers are aware of only two recent hotel developments in the CBD – one that has recently been approved at 55 Aird Street and another at 197 Church Street that remains under assessment. There are no other serviced apartments in the pipeline. It is therefore difficult to ascertain whether an oversupply in future is likely as the proponent purports.

e) No certainty that short stay accommodation is not viable in the medium to long term and does not warrant a permanent reduction of commercial floorspace requirements beyond current policy.

38. The Strategic Positioning Paper asserts that the short stay accommodation sector is expected to experience a slow recovery from Covid-19, forecasting that short stay occupancy rates will stay below sustainable levels until at least 2030 and will take even longer to return to pre-Covid levels. It is considered that any impact to the demand for short stay accommodation in the medium to long term will only be realised with greater certainty as the state gradually moves into the post pandemic phase.

39. Nevertheless, should there be any substantial impact to the sector in the medium to long term, this will likely influence *future* supply of short stay accommodation in Parramatta. As the Strategic Positioning Paper itself asserts, visitation and room demand are expected to recover in 2022 onwards as international borders reopen and domestic travel picks up. In these circumstances, it is expected the demand for the sector in the short to medium term would be taken up by existing short stay accommodation supply, which includes the subject site.

f) The site can demonstrate competitive positioning for serviced apartments.

40. The Strategic Positioning Paper suggests the location of the development at 180 George Street is a weak location for short-stay accommodation in the future and that many existing and proposed high quality short term accommodation facilities are better placed in the Parramatta CBD to attract future visitors.
41. Council Officers anticipate that as work places may become more flexible with staff working remotely; combined with a shift in some cases for office staff to move to regional areas, the need for some short-stay accommodation in the north-eastern part of the Parramatta CBD will be necessary to provide potential convenient short-stay locations to workers in the offices nearby when they are attending the office for meetings, workshops or conferences.
42. Furthermore, the serviced apartments at 180 George Street are the only short-stay accommodation in the north-eastern part of the CBD and adjoining the Parramatta Quay. The Strategic Positioning Paper raises two upcoming hotel developments – one on Smith Street between George Street and Phillip Street; and the second at 110 George Street Parramatta (The Octagon Site) which are yet to be fully completed; and may, for similar reasons argued by the proponent, be postponed or cancelled, thereby reinforcing the competitive positioning of the development as the only existing and well established stock in the north-eastern part of the CBD.

g) The removal of employment generating land uses risks the long-term economic growth of the City, including Parramatta's emergent visitor economy.

43. Should the conversion be approved, the Strategic Positioning Paper that employment generation rates of 133 jobs will be retained on the site, accounting for a loss of 5 ongoing jobs expected from serviced apartments equating to a job loss of no more than 4%. This argument is based on the job creation expected from other commercial land uses proposed on the site (retail, childcare centre etc.). The Strategic Positioning Paper also states that 400-500 jobs will continue to be generated as a result of ongoing construction at the site more broadly.
44. Council Officers have considered the role of the short stay accommodation sector in supporting other areas of the local economy. In particular, the sector will be key in supporting Parramatta's emergent visitor economy as educational and medical tourism are a key part of the Western Sydney Visitor Economy and the City of Parramatta Destination Management Plan (2019 – 2024).

45. Noting that major university campuses and innovations spaces in the City of Parramatta are in the pipeline, an increase in visiting academics in the long term is likely. Aside from typical occupants such as tourists and business travellers noted in the Strategic Positioning Paper, visiting academics also fit the market for short stay accommodation.
46. Notwithstanding the above, it is expected that as the commercial office market bounces back during the post pandemic recovery phase, there could still be a greater demand for short-stay accommodation in the Parramatta CBD from corporate travellers. In this context also, serviced apartments may emerge as a more attractive accommodation option, as they provide flexibility for self-isolation, remote working conditions, and professional cleaning services etc.
47. Considering the above, there is a risk that any deliberate and gradual removal of employment generating land uses at this time will negatively impact the long-term growth of emerging and returning economy sectors of the Parramatta CBD and potentially compromise its future role of economic significance as the 'second CBD' of the Sydney metropolitan.
 - h) The conversion from serviced apartments to residential may not result in increased retail spending.*
48. The Strategic Positioning Paper asserts the conversion of 60 serviced apartments to residential units will bring in an additional \$2.2 million of annual retail spending to the benefit of the local economy.
49. There is no further explanation or breakdown provided on the predicted annual spending amount, however it is considered this assumption holds true if only all or the majority of these prospective residential units are owner-occupied (as rental units are subject to higher vacancy rates). Statistics reveal that in Parramatta, 50% of homes were owned by investors in 2016 (*Profile of the Australian residential property investor*, CoreLogic 2016), and in 2018 at least, the rental vacancy rate for Parramatta was 4.4%, higher than the acceptable 3% balance between rental supply and demand (Parramatta Local Housing Strategy, pp. 146).
50. Importantly, ensuring that housing delivery complements and does not compromise the economic significance of the Central City is a key argument of Council's Local Housing Strategy, which reinforces the need to maximise the delivery of commercial floorspace in the Parramatta CBD and surrounds (Parramatta Local Housing Strategy 2020). The Planning Proposal contravenes this direction by seeking to increase residential uses on the site at the expense of existing commercial floorspace below the minimum amount.
 - i) The proposed residential units do not demonstrate compliance with the Apartment Design Guide (ADG) and should retain their existing employment generating use.*
51. It is noted proposed residential units comprise of serviced apartments on Levels 3 to 12 and that most of these floors have been built due to development of the site being underway for close to a year. Specifically, the Strategic Positioning Paper asserts that it is not possible to convert these floors into alternative employment generating uses such as office spaces, as the existing

ceiling heights and structural columns do not align with the design principles for commercial office buildings. It is asserted therefore that residential apartments are the only viable conversion of use.

52. Indicative Concept Plans (**Attachment 3**) have been provided to support the intent of the Planning Proposal to convert the 60 serviced apartments to residential. Council Officer's reviewed the plans for the proposed residential units and have identified several inconsistencies with the ADG.
53. Apartments 502, 503, 602, 603, S.0702, S.0703, 802, 803, 902, 903, 1002, 1003, 1102, 1103, 1202 and 1203 have been configured as one bedroom apartments but are labelled as studios, as the internal areas of these apartments range between 41-44sqm this is well below the ADG requirement of 50sqm for a one bedroom apartment. Apartment 401 is identified as a one bedroom unit but has an internal floor area of 48sqm (below the 50sqm minimum).
54. It has further not been demonstrated that the proposed additional residential apartments will comply with the cross ventilation and solar access requirements of the ADG. Given the inconsistencies noted above, it is considered the proposed residential units should retain their function as serviced apartments.

PLAN MAKING DELEGATIONS

55. The recommendation to the Local Planning Panel is for the Planning Proposal (**Attachment 1**) to not be supported for the purposes of seeking a Gateway Determination. As a result, Council is not seeking plan making delegations.

FINANCIAL IMPLICATIONS FOR COUNCIL

56. There are no financial implications for Council in the consideration of this matter.

CONCLUSION

57. Council Officers have assessed the Planning Proposal, including consideration of the key issues identified earlier in this report, and have determined that it should not be supported as it is inconsistent with Council's endorsed policy position to increase non-residential land uses within the Parramatta CBD.

NEXT STEPS

58. It is recommended the Local Planning Panel support the Council Officer recommendation that the Planning Proposal (**Attachment 1**) not be supported for the purposes of seeking a Gateway Determination.
59. Following Local Planning Panel's consideration of the recommendations of this report, the matter will be reported to an upcoming Council meeting along with the Panel's advice.
60. Should Council decide to not support the Planning Proposal, the proponent may choose to lodge a rezoning review with the DPE on the basis that Council has notified them in writing that it does not support the proposal or because the

Planning Proposal has exceeded its 90 day assessment timeframe (9 March 2022).

61. If a rezoning review is lodged, the DPE will notify Council and will request information as part of the rezoning review process.

Kashfia Hasan

Senior Project Officer Land Use

Bianca Lewis

Team Leader Land Use Planning

David Birds

Group Manager, Major Projects and Precincts

Jennifer Concato

Executive Director City Planning and Design

ATTACHMENTS:

- | | | |
|----------|--|----------|
| 1 | <u>↓</u> Draft Planning Proposal | 99 Pages |
| 2 | <u>↓</u> Strategic Positioning Paper | 10 Pages |
| 3 | <u>↓</u> Indicative Concept Plans | 11 Pages |

REFERENCE MATERIAL



Meriton Tower
L11, 528 Kent St
Sydney NSW 2000
Tel: (02) 9287 2888
Fax: (02) 9287 2777
meriton.com.au

23 December 2021

Attention: Bianca Lewis and David Bird
Team Leader, Major Projects & Precincts
City of Parramatta Council
126 Church Street
PARRAMATTA NSW 2150

URGENT COURIER

Dear Bianca and David

180 George Street, Parramatta – PP-2021-7278

Further to your email of 22 December 2021 please find enclosed the following in relation to the above:

- Two copies of the Planning Proposal;
- Our cheque for the amount of \$82,400 representing the application fee;
- One USB including all documents submitted with the Planning Proposal;
- Original application form and political donations disclosure statement.

Would kindly forward a receipt of payment at your earliest convenience.

Should you require anything further in this regard, please contact the undersigned.

Yours faithfully

KARIMBLA CONSTRUCTIONS SERVICES (NSW) PTY LIMITED

Matthew Lennartz
Executive Manager – Planning and Government

Encls



KARIMBLA CONSTRUCTIONS SERVICES (NSW) PTY LTD
ABN 67 152 212 809
DX 1177 SYDNEY NSW AUSTRALIA 2000

**KARIMBLA CONSTRUCTIONS SERVICES (NSW) PTY LIMITED**

Level 11, 528 Kent Street

Sydney NSW 2000

Ph: (02) 9287 2888

Fax: (02) 9287 2777

ABN: 67 152 212 809

REMITTANCE ADVICE**23 Dec 2021**

REF: PAR222

CHQ: 706776

PARRAMATTA CITY COUNCIL

PO BOX 32

PARRAMATTA NSW 2124

INVOICE NO. CLAIMS	PAID AMT (INC GST)	INSURANCE / LSL CONT	RETENTION 0%	NET PAY
-----	-----	-----	-----	-----
231221	82,400.00	0.00	0.00	82,400.00

<h1 style="margin: 0;">PARRAMATTA CITY COUNCIL</h1>		<h2 style="margin: 0;">PLANNING PROPOSAL APPLICATION</h2>	
A Planning Proposal must be prepared in accordance with the Department of Planning and Infrastructure's 'A guide to preparing a planning proposal', 'A guide to preparing local environmental plans' and Section 55 of the Environmental Planning and Assessment Act 1979.			
Disclaimer: The information provided by you on this form will be used by Parramatta City Council or its agents to process this application. Once collected by Council, the information can be accessed by you in accordance with Council's Access to Information Policy and Privacy Management Plan or in special circumstances, where Commonwealth legislation requires or where you give permission for third party access.			
Property Details			
Property details			
Number: 180		Street: GEORGE STREET	
Suburb: PARRAMATTA		Postcode: 2150	
Lot: 302		DP: 1250440	
Note: Signatures of all applicants and registered owners are required on the last page/s of this application form. Without these signatures Council will not accept this application.			
Planning Proposal Description			
Proposed amendment to LEP - Please tick all that apply (✓)			
Zone <input type="checkbox"/>	Floor Space Ratio <input type="checkbox"/>	Height of Building <input type="checkbox"/>	Heritage <input type="checkbox"/>
		Additional Permitted Uses <input type="checkbox"/>	Other <input checked="" type="checkbox"/>
Description of proposed amendment			
Amend Clause 7.12 of the Parramatta Local Environmental Plan 2011			
OFFICE USE ONLY			
Reference: RZ/	RZ Fee: \$	Lodged via Post <input type="checkbox"/>	
Date:	Receipt #:	Lodged in person <input type="checkbox"/>	

<h1 style="margin: 0; font-size: 2em; letter-spacing: 0.5em;">PARRAMATTA CITY COUNCIL</h1>	<h2 style="margin: 0; text-align: center;">PLANNING PROPOSAL APPLICATION</h2> <p style="font-size: 0.8em; margin: 5px 0;">A Planning Proposal must be prepared in accordance with the Department of Planning and Infrastructure's 'A guide to preparing a planning proposal', 'A guide to preparing local environmental plans' and Section 55 of the Environmental Planning and Assessment Act 1979.</p> <p style="font-size: 0.7em; margin: 5px 0;">Disclaimer: The information provided by you on this form will be used by Parramatta City Council or its agents to process this application. Once collected by Council, the information can be accessed by you in accordance with Council's Access to Information Policy and Privacy Management Plan or in special circumstances, where Commonwealth legislation requires or where you give permission for third party access.</p>						
<h3 style="margin: 0;">Accompanying Documentation</h3>							
<p>List all documents and studies to be submitted with the Planning Proposal</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="padding: 5px;">Planning Report</td></tr> <tr><td style="padding: 5px;">Economic Report</td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> <tr><td style="height: 20px;"></td></tr> </table>		Planning Report	Economic Report				
Planning Report							
Economic Report							
<p>Note: Signing this form acknowledges that any additional study required by Council and/or the Department of Planning and Infrastructure will be at no cost to Council and/or the Department of Planning and Infrastructure.</p>							
<p>Document copies required</p> <ul style="list-style-type: none"> Council requires 4 hardcopies of all documents submitted. Council requires 2 softcopies (on CD) of all documents submitted. If the proposed amendment includes mapping, a version of the maps containing sufficient detail to indicate the substantive effect of the proposed instrument is required. 4 hardcopies and 2 softcopies are required. 							
<h3 style="margin: 0;">Disclosure Statement of Political Donations and Gifts</h3>							
<p>It is required to disclose the following reportable political donations and gifts (if any) made by any person with a financial interest in the application within the period commencing two years before the application is made and ending when the application is determined:</p> <ul style="list-style-type: none"> all reportable political donations made to any local Councillor of Parramatta City Council, and all gifts made to any local Councillor or employee of Parramatta City Council. <p>A disclosure is required to be made in a statement accompanying the relevant planning application by the person who makes the application.</p> <p>Such disclosures are required to cover a period of two years before the application or submission is made and end when the application is determined. If a donation or gift is made after the lodgement of the required disclosure statement, a further statement is required to be provided within seven days after the donation or gift is made.</p> <p>Download a form from the Parramatta City Council website or ask Council staff for a 'Disclosure of Political Donations & Gifts Form'. Detailed requirements are outlined within that form.</p>							
<p>Is a disclosure statement provided? yes <input checked="" type="checkbox"/> no <input type="checkbox"/></p>							

PARRAMATTA CITY COUNCIL		PLANNING PROPOSAL APPLICATION	
		<p>A Planning Proposal must be prepared in accordance with the Department of Planning and Infrastructure's 'A guide to preparing a planning proposal', 'A guide to preparing local environmental plans' and Section 55 of the Environmental Planning and Assessment Act 1979.</p> <p>Disclaimer: The information provided by you on this form will be used by Parramatta City Council or its agents to process this application. Once collected by Council, the information can be accessed by you in accordance with Council's Access to Information Policy and Privacy Management Plan or in special circumstances, where Commonwealth legislation requires or where you give permission for third party access.</p>	
Applicant/s Details and Declaration			
Family name (or company & ABN): KARIMBLA PROPERTIES (NO. 13) PTY LTD ABN: 87 115 506 502			
Full given names OR company contact person: MATTHEW LENNARTZ			
Unit/House No: LEVEL 11, 528		Street Name: KENT STREET	
Suburb: SYDNEY		Postcode: 2000	
Home Phone:		Mobile:	
Office Phone: 9287 2888		Email: tpportal@meriton.com.au	
Applicant/s declaration			
To ensure transparency in Council's decision making functions, any application which is made by a Council employee/ Councillor and/or their immediate relative/s, will be referred to an independent consultant for assessment.			
I am an employee/Councillor or relative of an employee/Councillor of Parramatta City Council.			
If yes, please state relationship: _____			
I declare that all the information in the application and checklist is, to the best of my knowledge, true and correct.			
Applicant/s signature			
Owner/s Details and Declaration			
Family name (or company & ABN): KARIMBLA PROPERTIES (NO. 13) PTY LTD ABN: 87 115 506 502			
Full given names OR company contact person: MATTHEW LENNARTZ			
Unit/House No: LEVEL 11, 528		Street Name: KENT STREET	
Suburb: SYDNEY		Postcode: 2150	
Home Phone:		Mobile:	
Office Phone: 9287 2888		Email: tpportal@meriton.com.au	
Owner/s declaration			
To ensure transparency in Council's decision making functions, any application which is made by a Council employee/ Councillor and/or their immediate relative/s, will be referred to an independent consultant for assessment.			
I am an employee/Councillor or relative of an employee/Councillor of Parramatta City Council.			
If yes, please state relationship: N/A			
I/we own the subject land, consent to this application and consent to Council officers entering the premises during normal office hours for the purpose of conducting inspections relative to this application. I accept that all communication regarding this application will be through the nominated applicant.			
Owner/s signature - ALL OWNERS ARE TO SIGN (please note requirements for different types of ownerships overleaf)			
 DAVID CREMONA - DIRECTOR		 ROBYN MCCULLY - SECRETARY	
			

	<h2 style="text-align: center;">PLANNING PROPOSAL APPLICATION</h2> <p style="font-size: small;">A Planning Proposal must be prepared in accordance with the Department of Planning and Infrastructure's 'A guide to preparing a planning proposal', 'A guide to preparing local environmental plans' and Section 55 of the Environmental Planning and Assessment Act 1979.</p> <p style="font-size: x-small;">Disclaimer: The information provided by you on this form will be used by Parramatta City Council or its agents to process this application. Once collected by Council, the information can be accessed by you in accordance with Council's Access to Information Policy and Privacy Management Plan or in special circumstances, where Commonwealth legislation requires or where you give permission for third party access.</p>
	<h3 style="background-color: #f4a460; padding: 5px;">Owner(s) Consent Requirements</h3> <ul style="list-style-type: none"> <input type="checkbox"/> Company / Organisation - If the owner is a company, owner's consent is to be provided in two (2) of the following ways: <ul style="list-style-type: none"> • Signatures of 2 directors or a director and a company secretary (unless it has a sole director). • Execution of owner's consent form (or other document to the same effect) in accordance with s 127 (1) of the Corporations Act 2001. • Common seal affixed to, and execution of, owner's consent form (or other document to the same effect) in accordance with s 127 (2) of the Corporations Act 2001. If there is no common seal, a company letterhead is acceptable. • Together with an up to date ASIC Company Extract and other relevant supporting documentation. <input type="checkbox"/> Signing on owners behalf - If you are signing on the owner(s) behalf as the owner(s) legal representative, you must state the nature of your legal authority and attach documentary evidence (e.g. Power of attorney, executor, trustee, company director, etc). <input type="checkbox"/> New owner(s) - If the property has recently been sold, documentary evidence of the sale must be provided. Please provide one of the following: <ul style="list-style-type: none"> • A copy of the Certificate of Title. • A letter from your solicitor confirming settlement. • Previous owner(s) to provide owner(s) consent.

The URBIS logo consists of the word "URBIS" in a bold, white, sans-serif font. To the right of the text is a white square with a thin border. A white line extends from the top of this square, runs horizontally across the top of the page, and then turns vertically down the left side of the page, framing the logo and the title area.

URBIS

PLANNING PROPOSAL REPORT

180 George Street Parramatta

Prepared for
MERITON GROUP
7 December 2021

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	David Hoy
Senior Consultant	Rob Battersby
Project Code	P0036344
Report Number	Final

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

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You must read the important disclaimer appearing within the body of this report.

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EXECUTIVE SUMMARY

This report has been prepared by Urbis Pty Ltd on behalf of Meriton Group (**the Proponent**) in support of a Planning Proposal to amend the Parramatta Local Environmental Plan 2011 (**LEP**) in relation to land at 180 George Street, Parramatta (**the site**). The intended outcome of this Planning Proposal is to amend a site-specific provision (Clause 7.12) that prescribes a minimum floor space ratio (**FSR**) for defined non-residential uses to enable the conversion of 60 Meriton serviced apartment (**MSA**) suites to residential apartments.

The proposal delivers an urgent site-specific response to the economic consequences of the Covid-19 pandemic which have had a significant impact on the long-term commercial viability of the MSA business and the tourism and visitor accommodation sector in Parramatta. The minimum non-residential FSR control that applies to the site under Clause 7.12 was adopted under different circumstances which could not have been envisaged at the time. Accordingly, flexibility is required for this site under the specific circumstances.

Importantly, the specific circumstances apply to the subject site only and the Planning Proposal does not create a precedent for any other sites in the Parramatta CBD. The proposal relates to Clause 7.12 which is specific to the site, with unique terms adopted, being the inclusion of 'serviced apartments' which are now unviable. The levels of the building to which the Planning Proposal relate are constructed as serviced apartments with no alternative use other than residential. The area subject of the proposal is very minor and has minimal impact on employment or economic activity. The development retains almost 3,500 sqm of non-residential uses that is more than sufficient in this periphery location and will provide substantial employment opportunities. There is no other site in the Parramatta CBD where these set of circumstances apply.

The Planning Proposal is supported by an evidence-based Economic Strategic Positioning Paper prepared by Urbis (**Appendix A**) to articulate the economic justifications and merits of the proposal. This Paper demonstrates that no material negative impacts are expected to be generated by the proposed changes.

Background

Meriton is in the process of constructing a new mixed use project on the site, pursuant to a development consent granted by the Sydney Central City Planning Panel in October 2019 (**the original consent**) (DA/480/2018). The approved development is for two mixed use towers (referred to as the South Tower and the North Tower) comprising 767 residential units, 271 serviced apartments, 2,329 sqm retail floor space, a child care centre, a commercial gymnasium, five (5) basement levels, and public domain upgrade works.

The original consent has been amended by a series of modifications and development applications (**DAs**). The most recent DA was lodged in August 2021 and seeks to convert 122 (approved) serviced apartments to residential apartments (DA/789/2021). Upon the determination of DA/789/2021, a total of 60 MSA suites will remain across the site, contained within Levels 03-12 of the South Tower. The physical construction, internal fit-out, and services infrastructure of Levels 03-12 for the serviced apartments use has been completed. The only reason that the 60 MSA suites are retained is due to the provisions of Clause 7.12 and the restriction on utilising to Clause 4.6 to a vary a development standard that relates to FSR in the Parramatta City Centre.

As a consequence of Covid-19, the long-term commercial operation of MSA at the site is economically unviable and unsustainable. The pandemic significantly changed conventional business practices and the hospitality and tourism travel sectors. Impacts on the short term accommodation are evident through the dramatic drop in occupancy experienced across the MSA portfolio. These impacts are summarised below.

Table 1 Impact of Covid-19 on MSA Portfolio

MSA	Pre Covid-19 Occupancy *	Covid-19 Occupancy **	Covid-19 Impact
Parramatta	91%	58%	↓ 33%
NSW	88%	43%	↓ 45%
National	87%	44%	↓ 43%

Source: Meriton; Urbis

*indicates the Pre Covid-19 period as April 2019 to March 2020, **indicates Covid-19 Occupancy period as April 2020 to March 2021

By way of direct comparison, in the year prior to Covid-19, the existing MSA operation at 330 Church Street, Parramatta ('Altitude') performed strongly, with an average occupancy rate of 91% recorded for the year.

During the second (and longest) lockdown period in Greater Sydney (from June 2021 to October 2021), it recorded its lowest occupancy rate at 38%, reflecting a dramatic 53% decrease from pre Covid-19 levels. The economic impacts of Covid-19 will constrain future visitation and short-stay accommodation demand.

Accordingly, Meriton has investigated a range of alternative and viable employment-generating land uses for the 60 MSA suites at Levels 03-12 of the South Tower. The conversion of Levels 03-12 is critical to ensuring the long-term economic viability of the site and avoid the underutilisation of this significant mixed use CBD asset. However, the physical construction and internal fit-out of the floor plates at Levels 03-12 for the MSA suites is now complete. The floor plate configuration, floor-to-ceiling heights, and structural columns do not facilitate practical or viable adaptation to any alternative use. The only economically viable alternative use for the constructed floor space at Levels 03-12 is residential apartments. Residential accommodation is a use permissible with consent on the site; however it is restricted by the application of LEP Clause 7.12.

Objectives and Outcome of the Planning Proposal

The site is subject to the provisions of Clause 7.12 of the LEP. This is a site-specific clause which requires a building on the site to provide a minimum 1:1 FSR for defined non-residential uses, being: 'commercial premises'; 'tourist and visitor accommodation'; 'centre-based child care facilities'; and '**serviced apartments**'. The conversion of 60 serviced apartments on the site (at Levels 03-12 of the South Tower) to residential apartments will result in a 0.43:1 FSR for the defined non-residential uses. This is non-compliant, and the LEP restricts the application of Clause 4.6 to accommodate this relatively modest change of use.

Accordingly, the intended outcome of this Planning Proposal is to amend Clause 7.12 to reduce the minimum FSR for a building used for any of the defined non-residential land uses to 0.43:1.

Importantly, the Planning Proposal does not seek any change to the existing B4 Mixed Use zoning of the site, the applicable height of building development standard (190 metres) or FSR development standard (10:1), or any other LEP controls or provisions. The proposal simply seeks to amend a site-specific provision to reduce the minimum FSR for defined non-residential uses and enable an alternative land use for Levels 03-12, which would otherwise remain unoccupied and prevent orderly, economic, and efficient use of land.

The conversion of 60 MSA suites to residential apartments would not require any internal modifications or physical changes to the built form, massing, or appearance of the approved development, in relation to building height, gross floor area, building setbacks or separation, the public domain, or external façades. The proposal only seeks the land use reclassification of accommodation floor space at Levels 03-12 from 'serviced apartments' (as approved) to 'residential accommodation' (as proposed). The new land use is permissible with consent in Zone B4 Mixed Use and is entirely consistent with the zone objectives.

Strategic Merits

The Planning Proposal is justifiable from a strategic merits perspective for the following reasons:

- The proposal is consistent with all prevailing strategic planning policy. The minor change of use on this specific site is of no strategic consequence and is otherwise not inconsistent with strategic planning policy directions. It will deliver a high quality mixed use development in an appropriate location.
- The Parramatta CBD has a robust future supply of short-term visitor accommodation. There are currently 936 hotel rooms and 346 serviced apartments within the CBD. With a pipeline of 1,538 hotel rooms and 274 serviced apartments by 2027, short term accommodation units will grow to 3,094. Short term accommodation in the CBD will increase by 2.5x. The conversion of 60 MSA suites will only result in a 3% decrease in total supply by 2027 and instead will contribute to housing supply.
- The short-stay accommodation sector in the CBD will be significantly impacted by Covid-19 given that business travel accounts for a significant market share. As remote working conditions have flourished throughout Covid-19 (aided by advances in remote working technology), it is likely businesses will embrace remote working moving forward. Therefore it is unlikely business related travel will return to pre-Covid levels. Even as occupancy in the CBD recovers beyond 2025 and new supply is absorbed by additional demand, occupancies are expected to stay well below the sustainable occupancy rate of 75% until at least 2030 and will take even longer to return to the pre-Covid average occupancy rate of 84%.

- The site is on the periphery of the Parramatta CBD, beyond the Commercial Core (zoned B3). The Commercial Core is the heart of the Central River City with a strategic focus for employment-generating uses that contribute to long term economic growth of the CBD. Strong competitive and strategic positioning is vital for short term accommodation facilities given that the supply pipeline will create intense competition, particularly as the industry recovers from Covid-19 and occupancy remains below a sustainable rate. The site's location presents a weak competitive positioning for serviced apartments.
- Due to its relatively limited scale, Meriton has always proposed that the MSA operation at 180 George Street site would serve as a satellite overflow offering to the existing operation at 330 Church Street, Parramatta ('Altitude'). All administration, servicing, maintenance, or cleaning jobs associated with MSA suites on the subject site would be managed from the existing Altitude operation. Benchmarked against rates for full-time staff per room across the MSA portfolio, the conversion of 60 MSA suites will only result in a loss of five full-time jobs (4% reduction of total jobs on site).
- The site will retain some 3,492 sqm of employment-generating uses. Based on industry standard job density benchmarks, these uses will support 133 direct on-site jobs. Furthermore, the operation of the other commercial uses is forecast to support a further 28 indirect jobs through flow-on economic multiplier effects. The continued operations will deliver around \$15 million gross value add to the local economy each year. Around 400 - 500 jobs will continue to be generated by the proposed development during the construction period. With residential apartments requiring the same high level of design as serviced apartments, the construction cost will remain largely unchanged. In effect, the supported jobs and economic contribution to the local economy is equal to the original development approval.
- There is expected to be a considerable oversupply of 962 short term accommodation in 2030. This indicates that the conversion of the MSA suites to residential apartments will not adversely impact visitation within the Parramatta CBD, as they will be easily catered for by other high quality developments. The additional 60 residential apartments have potential to support around 160 additional residents within the CBD. These residents will create an additional \$2.2 million of annual retail spending that will benefit existing and new businesses. This additional spending will far outweigh the potential economic loss to the local economy from losing five ongoing jobs, and no change to tourists spending.
- The provision of additional residential apartments aligns with the State Government target to provide 14,000 new dwellings within the Parramatta CBD over the next 40 years. At a District level, the proposal will contribute to the 20-year strategic target for the Central City District of 207,500 new dwellings.
- The proposal will deliver a mix of residential typologies, including studio apartments, one-bedrooms, and two-bedroom units. Different typologies will satisfy the demand for housing choice and diversity and respond to changing demographic characteristics. The proposal delivers a range of housing tenure, price points, and design. The housing typology will cater to projected future household structures, including couples, single parents, couples with children, and single persons living in high density accommodation. A mix of residential typologies will achieve an improved 'place-based' outcome that leverages the site's location within the CBD and close proximity to employment, local services, and transport infrastructure.
- The proposal responds to State Government's vision to create '30-minute' cities where residents can access their metropolitan centre within 30 minutes by public transport. The site is within walking distance to Parramatta train station, the new Harris Street station on the Light Rail network, and the Wharf Ferry stop. The site is well placed to leverage from projected investment and transport infrastructure upgrades.
- The site represents an entirely logical and appropriate location for additional residential accommodation given its strategic location and immediate proximity to convenience retail, employment opportunities, community health and education facilities, and public transport. Future occupants will contribute street level activation and social vibrancy throughout the pedestrian public domain. An increased residential population will deliver enhanced activation and net economic benefits to surrounding businesses and the wider CBD. New residents will contribute to a liveable, dynamic, vibrant, and sustainable neighbourhood.

Site-Specific Merits

The Planning Proposal is justifiable from a site-specific merits perspective for the following reasons:

- The site-specific provision that imposes a minimum FSR for defined non-residential land uses was drafted and gazetted in April 2018 in the context of the prevailing economic climate at the time and conceived as part of the Parramatta CBD Strategy over a decade ago. The Clause is now not fit-for-

purpose in light of the significant economic impacts of Covid-19 on the short term accommodation sector. Until the emergence of Covid-19, the Proponent's commitment was clearly demonstrated by the original DA and the commencement of construction on the project (with a CIV of \$300 million) that continued throughout the pandemic and extensive lockdowns. The commitment to ongoing construction maintained thousands of secure jobs; however the MSA use within the constructed building is no longer viable.

- The proposal does not derogate the intent and function of Clause 7.12 insofar as it retains some 3,492 sqm of non-residential land uses. These employment-generating uses include retail and business tenancies, a commercial gym, and a child care centre. The circumstance of the proposal is unique to the site insofar as it relates to a site-specific clause that imposes a minimum FSR control for defined non-residential uses. This provision only applies to the subject site. Accordingly, the amendment to the LEP will not create a precedent for other comparable sites on the periphery of the Parramatta CBD.
- The physical construction internal fit-out, and service connections of the floor plates at Levels 03-12 for the approved serviced apartments use has been completed. However, the floor plate configuration, floor-to-ceiling heights, and location of structural columns do not facilitate the practical or viable adaptation of these levels to any alternative employment-generating land use, such as commercial offices. Therefore the conversion of the serviced apartments to residential accommodation is the only economically feasible option for Levels 03-12 and one which makes efficient use of the constructed apartment floor space.
- The MSA suites are capable of immediate conversion and occupancy for residential accommodation. No change is required to the internal layout, floor plate configuration, ceiling heights, or private open spaces.
- The proposal will not fundamentally change the 'nature' or 'use' of the floor space at Levels 03-12; the levels will continue to function as self-contained accommodation for occupants. The principle point of difference is that the apartments will no longer be subject to a perceived restriction on the period of occupation and will not be regularly serviced or cleaned by the owner or manager of the building on a commercial basis. There are no restrictions on the period of occupation under the approved DA.
- The MSA suites achieve a high level of compliance with design principles of SEPP 65 and the Apartment Design Guide, specifically with regards to solar access, natural ventilation, private open space, safety and security, internal and external amenity, storage, floor-to-ceiling heights, and sustainability.
- The proposal does not necessitate any physical changes to the approved built form, massing, or external appearance, in relation to building height, gross floor area, setbacks, building separation, public domain, or façade design. It is entirely compatible with the future context and will not create any amenity impacts in relation to wind, noise, air quality, overshadowing, privacy, overlooking, view loss, or solar access.
- The site is highly urbanised, having had an established history for mixed use. It is free of significant natural environmental constraints that have not already been assessed in the extensive rezoning process and subsequent DA approvals. The proposal will have no impact on the natural environment, in relation to acid sulfate soils, contamination, planning, flora and fauna, biodiversity, water protection, or heritage.
- The proposal does not necessitate any changes to the approved vehicle access arrangements nor car parking allocated to the 60 MSA suites. In this regard, the proposal will have negligible traffic impacts.
- There are no additional construction works required to facilitate the conversion of serviced apartments to residential apartments. There will be no additional construction activity or associated negative amenity impacts (such as noise, air pollution, vibration, or construction traffic) as a consequence of the proposal.

Conclusion

Aligned with the strategic and site-specific merits, the Planning Proposal is entirely appropriate as it will facilitate the conversion of MSA suites to residential apartments and promote the orderly, economic, and efficient use of constructed floor space which would otherwise remain unoccupied and underutilised. A key object of the Environmental Planning and Assessment Act 1979 is to promote the orderly and economic use and development of land.

Importantly, this Planning Proposal is specific only to the subject site given the unique provisions of Clause 7.12, the extent of construction, the configuration of the levels to which the Planning Proposal relates, and the clear evidence of how the Covid-19 pandemic has affected conventional business practices and hospitality and tourism travel sectors. It will not establish a precedent for any other developments.

Accordingly it is recommended that Council resolves to support this site-specific Planning Proposal and forward the amended LEP to the NSW Department of Planning, Industry and Environment for Gateway Determination in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979.

1. INTRODUCTION

1.1. OVERVIEW

This report has been prepared by Urbis Pty Ltd on behalf of Meriton Group (**the Proponent**) in support of a Planning Proposal to amend the Parramatta Local Environmental Plan 2011 (**LEP**) in relation to land at 180 George Street, Parramatta (**the site**). The intended outcome of this Planning Proposal is to amend a site-specific provision of the LEP (Clause 7.12) that prescribes a minimum floor space ratio (**FSR**) for defined non-residential uses to enable the conversion of 60 Meriton serviced apartments (**MSA**) to residential apartments. The proposal delivers an urgent site-specific response to the social and economic consequences of the Covid-19 pandemic which has had a significant impact on the long-term commercial viability of the MSA business and the tourism and visitor accommodation sector in Parramatta.

1.2. BACKGROUND AND PROJECT INTENT

Meriton is currently undertaking the construction of a new mixed use project on the site, pursuant to a development consent granted by the Sydney Central City Planning Panel to DA/480/2018 (**the original consent**). The consent approved development for two mixed use towers (referred to as the South Tower and the North Tower) comprising 767 residential units, 271 serviced apartments, 2,329 sqm retail floor space, a child care centre, a commercial gymnasium, five (5) basement levels, and public domain upgrade works.

The original consent has been amended by a series of modifications and development applications (**DAs**). The most recent DA was lodged to Parramatta City Council on 26 August 2021 (DA/789/2021) and seeks to convert 122 (approved) serviced apartments to residential apartments at Levels 13-30 of the South Tower. Upon the determination of DA/789/2021, a total of 60 MSA suites will remain across the site, contained within Levels 03-12 of the South Tower. The physical construction, internal fit-out, and services infrastructure of the levels for the approved serviced apartments use has been completed.

As a consequence of the Covid-19 pandemic, the long-term commercial viability of the MSA business at the site is forecast to be economically unsustainably. It is anticipated that the social and economic outcomes of the pandemic will result in a significant change to conventional business practices and the hospitality and tourism travel sectors and will constrain future visitation growth and short-stay accommodation demand.

Accordingly, Meriton has investigated a range of alternative viable and employment-generating land uses for the 60 MSA suites at Levels 03-12 of the South Tower to respond to the economic impacts of the pandemic and avoid the underutilisation of this significant mixed use asset within the Parramatta CBD. The repurposing of Levels 03-12 for an alternative land use is critical to stimulating the long-term economic viability of the site. However, physical construction and internal fit-out of Levels 03-12 for the approved MSA use is complete, and the floor plate configuration, floor-to-ceiling heights, and location of structural columns do not facilitate the practical conversion or adaptation of these levels to any alternative viable land use. The only economically feasible alternative land use for the MSA suites at Levels 03-12 is residential accommodation.

The conversion of the 60 MSA suites to residential apartments at Levels 03-12 will result in the following changes to the floor space ratio (**FSR**) and gross floor area (**GFA**) of the development as approved.

Table 2 GFA / FSR Summary

Land Use	Approved GFA *	Approved FSR *	Resultant GFA	Resultant FSR
Residential	83,170 sqm	10.43:1	87,971 sqm	11.03
Serviced apartments	4,801 sqm	0.6:1	-	-
Retail	2,894 sqm	0.36:1	2,894 sqm	0.36:1
Child care	598 sqm	0.07:1	598 sqm	0.07:1
Total	91,463 sqm	11.46:1	91,463 sqm	11.46:1

* Pending approval of DA/789/2021 to convert 122 serviced apartments to residential apartments at Levels 13-30

Clause 7.12 of the Parramatta LEP 2011 applies to development on the subject site and provides as follows:

(2) Despite clauses 4.4 and 7.2, the minimum floor space ratio for a building on land to which this clause applies that is used for any of the following purposes is 1:1—

- (a) commercial premises,*
- (b) tourist and visitor accommodation,*
- (c) centre-based child care facilities,*
- (d) serviced apartments.*

As detailed in **Table 1**, the conversion of the serviced apartments at Levels 03-12 to residential apartments results in a total non-residential GFA of 3,492 sqm (0.43:1 FSR). The FSR for the non-residential land uses does not comply with the minimum 1:1 FSR for the defined non-residential land uses under Clause 7.12(2) and the LEP restricts the application of Clause 4.6 to accommodate this extent of change of use.

Accordingly, the intended outcome of this Planning Proposal is to amend Clause 7.12 to reduce the minimum FSR for a building used for any of the defined non-residential land uses to 0.43:1.

Importantly, the Planning Proposal does not seek any change to the existing B4 Mixed Use zoning of the site, the applicable height of building development standard (190 metres) or FSR development standard (10:1), or any other LEP controls or provisions. The proposal simply seeks to amend a site-specific provision to reduce the minimum FSR for defined non-residential uses and enable an alternative land use for Levels 03-12, which would otherwise remain unoccupied and prevent orderly, economic, and efficient use of land.

The subsequent conversion of 60 MSA to residential apartments would not involve any internal modifications or physical changes to the built form, massing, or appearance of the approved development, in relation to building height, gross floor area, building setbacks or separation, the public domain, or external façades. The proposal only seeks the land use reclassification of accommodation floor space at Levels 03-12 from 'serviced apartments' (as per the approved development) to 'residential accommodation' (as proposed). This land use is permissible with consent in Zone B4 Mixed Use and is consistent with the zone objectives.

This report has been prepared to assist Parramatta City Council in the preparation of a Planning Proposal to amend the site-specific Clause 7.12 of the Parramatta Local Environmental Plan 2011.

1.3. REPORT STRUCTURE

This Planning Proposal request has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979 (**EP&A Act**) and the Department of Planning, Industry and Environment (**DPIE**) guidelines '*Planning Proposals: A guide to preparing planning proposals*' dated December 2018.

As required by Section 3.33 of the EP&A Act, this Planning Proposal request includes the following:

- Overview of the site history, description of the site and its context.
- Outline of the statutory and strategic planning context.
- Description of the proposed vision and indicative concept.
- Description of the proposed amendment to the LEP and details to indicate the effect of the amendments.
- Statement of the objectives and intended outcomes of the proposal.
- Explanation of the provisions of the proposal that are to be included in the LEP.
- Summary of the justification of the proposal, including an environmental assessment.
- Description of the community consultation process that would be expected to be undertaken before consideration is given to making of the planning instrument.
- Indicative project timeline.
- Conclusion and justification.

1.4. ACCOMPANYING DOCUMENTATION

This Planning Proposal request is supported by the following documentation:

Table 3 Planning Proposal Documentation

Document	Prepared by	Appendix
Economic Strategic Positioning Paper	Urbis Pty Ltd	A
Indicative Concept Plans	Woods Bagot	B

2. SITE AND SURROUNDING CONTEXT

2.1. THE SITE

The Planning Proposal relates to land at 180 George Street, Parramatta (**the site**) (refer **Figure 1**). The legal property description of the site is Lots 201, 202, 203, and 204 in DP 1082194 and SP 74916.

The site comprises an irregular shaped parcel of land on the north-eastern corner of the intersection of George Street and Charles Street in the eastern periphery of Parramatta Central Business District (CBD).

The site has the following boundaries:

- Primary south-facing frontage to George Street (69 metres);
- Primary west-facing frontage to Charles Street (95 metres);
- Rear east- and north-facing boundary to the Parramatta River foreshore reserve (77 metres); and
- Side east-facing boundary to a heritage-listed item (Harrisford) (63 metres).

The site has a relatively flat topography and a consolidated area of 7,978.5 sqm.

Figure 1 Site Location



Source: Urbis

2.2. SITE FEATURES

In its current condition, the western portion of the site fronting Charles Street is occupied by an existing multi-storey mixed use building containing ground level retail and commercial uses and MSA suites at upper levels. The existing building is constructed above a common 1-2 level basement car park, with vehicular access provided via an existing driveway from George Street.

The predominant part of the site is currently under construction for a new mixed use development project, generally comprising two mixed use towers (referred to as the South Tower and the North Tower) containing residential accommodation, serviced apartments, retail floor space, a child care centre, a commercial gymnasium, and a five-level basement car park, and associated public domain upgrade works.

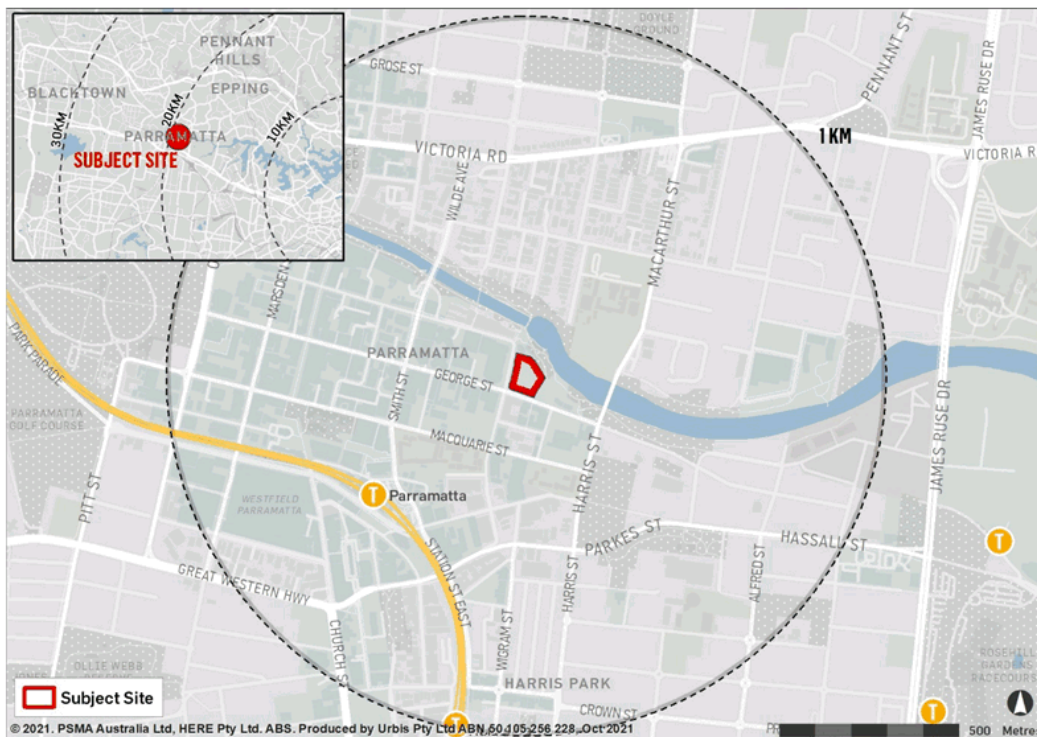
2.3. LOCALITY CONTEXT

The site is located within the north-eastern periphery of the Parramatta CBD. The Greater Parramatta Metropolitan Centre encompasses the Parramatta CBD and is considered the core of the Central River City, which provides a transition between the well-established Eastern Harbour City and future Western Parkland City. Greater Parramatta is centred on world-class health, education, and research institutions, in addition to finance, business services, and administration. The CBD is well connected with a large majority of workers travelling by public transport, including by train, ferry, bus, Light Rail (future), and Metro (future).

The surrounding context is commensurate with the Parramatta CBD and is summarised as follows:

- To the north generally extends the Parramatta River foreshore, the Ferry wharf, and the Port Bar.
- To the south lies a State heritage listed property ('Harrisford'). Beyond this property lies 184-188 George Street which has been subject to a Planning Proposal to amend the building height and FSR controls to facilitate a building height of 120 metres and an FSR of 10:1 (excluding additional design competition bonus floorspace and building height). The Planning Proposal was approved at Gateway determination.
- To the south lies a 9-storey shop-top housing development on the corner of Charles and George Streets. This land adjoins 109-113 George Street, which is a 19-storey mixed use development comprising retail / commercial space at ground level and 264 residential apartments over basement car parking.
- To the west land is characterised by mixed use multi-storey commercial premises, including a 20-storey commercial building occupied by the Commonwealth Bank.

Figure 2 Regional Context



Source: Urbis

2.4. SURROUNDING TRANSPORT NETWORK

Rail Network

The site is located 650 metres (walking distance) from Parramatta railway station. The station is served by the T1, T2, T5, and Blue Mountains lines which provide frequent and direct train services to Greater Sydney.

Parramatta Light Rail

The new Harris Street station of the Parramatta Light Rail network is located some 380 metres south-west of the site. The Light Rail will provide connectivity between the major business, health and educational nodes within Greater Parramatta and Olympic Park. The new 12km network will link Parramatta's CBD and train station to the Westmead Health Precinct, Cumberland Hospital Precinct, CommBank Stadium, the Camellia Town Centre, the new science, technology and innovation museum Powerhouse Parramatta, the private and social housing redevelopment at Telopea, Rosehill Gardens Racecourse, and three Western Sydney University campuses. The new Light Rail will increase connectivity to the surrounding suburbs and enhance access to public transport for residents. The Light Rail network is expected to begin operating in 2023.

Ferry Network

The site is within close proximity to the Parramatta Wharf Ferry stop. This wharf is served by the F3 route of the Sydney Ferries Network and provides a frequent and direct ferry service to Circular Quay.

Sydney Metro

Sydney Metro is Australia's largest public transport infrastructure project. The project will support a growing city and deliver world-class metro services to more communities. The Sydney Metro network comprises:

- The Metro North West Line;
- Sydney Metro City & Southwest;
- Sydney Metro West; and
- Sydney Metro – Western Sydney Airport.

Sydney Metro West is a new 24-kilometre metro line with stations confirmed at Westmead, **Parramatta**, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays, Pyrmont, and Hunter Street in the Sydney CBD. This once-in-a-century infrastructure investment will transform Sydney for generations, doubling rail capacity between Parramatta CBD and the Sydney CBD, linking new communities to rail services, and supporting employment growth and housing supply. Sydney Metro West will double rail capacity, with a target travel time of approximately 20 minutes between Parramatta and the Sydney CBD.

The site is located some 200 metres from the new Parramatta Metro Station, which will be a strategically important station on the Sydney Metro network providing access to the heart of the Central River City.

Formal project planning for Sydney Metro West started in 2019, and the first major planning approval was granted in March 2021, for the project concept between Westmead and the Sydney CBD and major construction work between Westmead and The Bays. Construction started on Sydney Metro West in 2020.

3. PROJECT HISTORY

3.1. PLANNING PROPOSAL

On 26 November 2015, Meriton submitted a request to Parramatta City Council to prepare a Planning Proposal to amend the site-specific planning controls under the Parramatta LEP 2011 (**LEP**).

The LEP amendment was gazetted on 20 April 2018 and amended the LEP as follows:

- amend the height of building maps to apply a maximum building height of 190 metres (218.5 metres including design competition bonus);
- amend the floor space ratio map to apply a maximum FSR of 10:1 (11.5:1 FSR including design competition bonus);
- amend the key sites special provisions map and sun access protection map;
- amend Clause 7.6 Airspace Operations to ensure the clause applies to the subject site; and
- insert additional local provisions clause to require minimum 1:1 employment-generating FSR for employment-generating uses (retail, commercial, childcare centres, tourist accommodation, serviced apartments, and the like), and impose maximum car parking rates.

Key considerations from DPIE's Plan Finalisation Report (dated 15 March 2018) are summarised as follows:

- The Planning Proposal facilitates the further development of the site. As a result of the required design excellence process, it has the potential to deliver a high-quality development outcome that will contribute to the Parramatta CBD skyline.
- The proposed development facilitates the delivery of some 753 new dwellings and new employment-generating land uses. This is appropriate in the CBD context.
- Ground floor retail land uses contribute to the activation of street frontages and employment generation.
- The broadening of land uses included in the minimum commercial FSR of 1:1 was based on a site-specific merit assessment that considered the nature of the existing serviced apartments on the site and need to provide flexibility. No new land uses are proposed to be introduced to the site; rather, the range of land uses that can be considered within the required 1:1 FSR of employment-generating floor space has been expanded. All proposed land uses are defined within the LEP.
- In the CBD context, a maximum height and FSR is considered a suitable development outcome that provides for flexibility in design, and the proposed FSR and height are considered reasonable.

The Planning Proposal was progressed concurrently with the preparation of a new DA seeking consent for a 58 and 66 storey mixed use development (DA/480/2018). The concept design for the DA was used as the basis for the amended LEP controls in the Planning Proposal and the accompanying site-specific DCP.

Following the gazettal of the Planning Proposal, the mixed use development (DA/480/2018) was lodged to Parramatta City Council. **Table 4** in the following section provides an overview of DA/480/2018 and subsequent modifications and development applications as relevant to the subject Planning Proposal.

3.2. DEVELOPMENT HISTORY

Table 4 provides an overview of development applications (DA) relevant to this Planning Proposal.

Table 4 Development Application Review

Reference	Description	Determination
DA/480/2018	<p>The original development application for the site is described as follows:</p> <ul style="list-style-type: none"> ▪ Construction of two residential towers of 58 and 66 storeys over a mixed use podium providing a total of 1,037 residential units comprising: <ul style="list-style-type: none"> - 776 private residences including the change of use of 145 serviced apartments into private residences within Buildings B and C; - 271 serviced apartments; ▪ Construction of 5 levels of basement car parking (bulk excavation approved under a separate application) comprising: <ul style="list-style-type: none"> - 533 car spaces (total spaces including podium levels – 654); - 1 car wash bay; - 321 bicycle spaces; ▪ Podium comprising the following uses: <ul style="list-style-type: none"> - A 704 sqm and 101 sqm retail premises; - A 475 sqm commercial gymnasium; - A 499 sqm child care centre; - Lobbies to the services apartments within the southern tower; - Private pool facilities for the residential dwellings; - Car parking and delivery facilities comprising 121 car spaces including 12 accessible spaces (total spaces including basement level - 654); - Waste disposal facilities and other services; ▪ Retention of Buildings B and C and change of use of 147 serviced apartments to private residences; ▪ Construction of a 6-metre wide public access pathway along the eastern and northern boundaries; and ▪ Public Domain improvements. <p>The proposal also included retention of a portion of the existing MSA suites.</p> <p>The proposal was established on the winning entry in a design competition that was awarded design excellence, triggering the following bonuses:</p> <ul style="list-style-type: none"> ▪ Building height bonus – 15% (increase from 190m to 218.5m); and ▪ Floor space ratio bonus – 15% (increase from 10:1 to 11.5:1). 	<p>Approved by Sydney Central City Planning Panel</p> <p>9 October 2019</p>

Reference	Description	Determination																																													
	<p>The development generally aligned with the built form parameters for the site envisaged by the Parramatta LEP 2011 and Parramatta DCP 2011.</p> <p>The approved residential and serviced apartments mix was as follows:</p> <table><tr><th></th><th>North Tower</th><th>South Tower</th><th>MSA within South Tower</th><th>MSA converted</th></tr><tr><th></th><th>Level 02-66</th><th>Level 43-57</th><th>Level 04-42</th><th>Level G-11</th></tr><tr><td>Type of Unit</td><td>Private</td><td>Private</td><td>MSA</td><td>Private</td></tr><tr><td>Studio Units</td><td>-</td><td>-</td><td>78</td><td>2</td></tr><tr><td>1 Bedroom</td><td>138</td><td>33</td><td>154</td><td>43</td></tr><tr><td>2 Bedrooms</td><td>309</td><td>41</td><td>39</td><td>87</td></tr><tr><td>3 Bedrooms</td><td>89</td><td>6</td><td>-</td><td>13</td></tr><tr><td>4 Bedrooms</td><td>4</td><td>1</td><td>-</td><td>-</td></tr><tr><td>Total</td><td>540</td><td>81</td><td>271</td><td>145</td></tr></table> <p>Following the approval to DA/480/2018, the development contained a total of 271 serviced apartments (located at Levels 04-42 of the South Tower).</p>		North Tower	South Tower	MSA within South Tower	MSA converted		Level 02-66	Level 43-57	Level 04-42	Level G-11	Type of Unit	Private	Private	MSA	Private	Studio Units	-	-	78	2	1 Bedroom	138	33	154	43	2 Bedrooms	309	41	39	87	3 Bedrooms	89	6	-	13	4 Bedrooms	4	1	-	-	Total	540	81	271	145	
	North Tower	South Tower	MSA within South Tower	MSA converted																																											
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2 Bedrooms	309	41	39	87																																											
3 Bedrooms	89	6	-	13																																											
4 Bedrooms	4	1	-	-																																											
Total	540	81	271	145																																											
Modifications to DA/480/2018	<p>The original consent to DA/480/2018 has been subject to a series of modification applications, generally relating to the following amendments:</p> <ul style="list-style-type: none">▪ Increased building height (lift overruns);▪ Conversion of strata lots and reallocation of car parking;▪ Ground floor internal layout;▪ Internal layout and unit mix changes;▪ Internal layout of basement levels;▪ Implementation of the Heritage Interpretation Strategy;▪ Hours of operation;▪ Amendments to approved residential unit mix; and▪ Business identification signage.																																														
DA/480/2018/J	<p>This Section 4.55(1A) modification amended the internal layout of the podium and basement car park, the unit mix (a reduction of 17 units), building façade to the North and South Towers, and the through site-public domain link. The modifications proposed a combination of new residential and serviced apartments and conversion of approved serviced apartments to residential.</p>	Approved 18 December 2020																																													

Reference	Description	Determination
	Following the approval to DA/480/2018/J, the development contained a total of 266 serviced apartments (located at Levels 04-42 of the South Tower).	
DA/513/2021	<p>This DA sought a change of use from 84 serviced apartments to 72 residential units and internal configuration changes at Levels 31-42 in the South Tower.</p> <p>The assessment of the DA included the following key merit considerations:</p> <ul style="list-style-type: none"> ▪ The proposed modified GFA of the development (91,678 sqm) did not exceed the maximum FSR development standard (11.49:1). ▪ The proposal maintained design excellence as per the original approval. ▪ The resultant commercial GFA (16,209 sqm) comprised the following: <ul style="list-style-type: none"> - 12,773 sqm – serviced apartments; - 665 sqm – child care centre; - 338 sqm – commercial floor space; - 976 sqm – Charles Street retail space; and - 1,447 sqm – new podium retail. ▪ The resultant non-residential FSR (2.03:1) complies with the minimum 1:1 FSR for defined non-residential land uses prescribed in Clause 7.12(2). <p>Following approval to DA/513/2021, the development contained a total of 182 serviced apartments (located at Levels 03-30 of the South Tower) comprising:</p> <ul style="list-style-type: none"> ▪ 48 x studio units ▪ 107 x one-bedroom units ▪ 26 x two-bedroom units ▪ 1 x three-bedroom units 	Approved 23 September 2021
DA/789/2021	<p>This DA seeks to convert 122 MSA suites at Levels 13-30 of the South Tower to residential apartments. The justification for the proposal is as follows:</p> <ul style="list-style-type: none"> ▪ The serviced apartments are no longer economically feasible due to the impacts of Covid-19 halting business travel and tourism travel. ▪ There is an over-supply of tourist accommodation in the Parramatta CBD. ▪ The existing operation at 330 Church Street ('Altitude') provides 254 MSA and is a more strategically located and economically viable site. ▪ The proposal does not change the height, GFA, or urban design of the approved development; it seeks a redistribution of permitted land uses. <p>The proposed non-residential GFA (8,293 sqm) comprises the following:</p> <ul style="list-style-type: none"> ▪ Commercial / retail premises – 2,894 sqm ▪ Child care – 598 sqm 	<p>DA Lodged 26 August 2021</p> <p>Pending determination</p>

Reference	Description	Determination
	<ul style="list-style-type: none">▪ Serviced apartments – 4,801 sqm <p>The resultant non-residential FSR (1.04:1) complies with the minimum 1:1 FSR for defined non-residential land uses prescribed in Clause 7.12(2).</p>	

3.3. PRE-LODGE MENT DISCUSSIONS WITH COUNCIL

The Proponent has discussed the intention to lodge this site-specific Planning Proposal with senior Council executives. Council has provided preliminary advice on the statutory and strategic matters of consideration for the Planning Proposal and technical studies and documentation required to substantiate the case.

4. INDICATIVE DEVELOPMENT OUTCOME

The objective of this Planning Proposal is to facilitate the conversion of 60 Meriton serviced apartments at Levels 03-12 of the South Tower to 60 residential apartments. The proposal delivers an urgent site-specific response to the significant and dramatic economic consequences of the Covid-19 pandemic.

4.1. INDICATIVE CONCEPT PROPOSAL

This Planning Proposal is supported by an indicative concept proposal for the residential apartments at Levels 03-12 of the South Tower aligned with the proposed amendment to Clause 7.12 of the LEP.

The proposed conversion of 60 MSA to residential apartments would not involve any internal modifications or physical changes to the built form or external appearance of the approved development, in relation to building height, gross floor area, building setbacks or separation, the public domain, or façade presentation.

Whilst development consent for the proposal will need to be sought via a future development application submitted to Parramatta City Council, the indicative concept proposal is described as follows.

Land Use

The proposal changes the use of accommodation floor space at Levels 03-12 of the South Tower from 'serviced apartments' (as per the approved development) to 'residential accommodation' (as defined).

Gross Floor Area and Floor Space Ratio

The gross floor area (GFA) of the 60 MSA at Levels 03-12 as per the approved development is 4,801 sqm.

The proposed conversion of the 60 MSA suites to 60 residential apartments will not involve any change to the approved GFA (as per the relevant definition of 'gross floor area' in the Parramatta LEP 2011).

However, the proposal will result in changes to the approved GFA and FSR land use mix across the development as detailed in **Table 5** below.

Table 5 GFA Comparison

Land Use	Approved GFA	Indicative Concept GFA	Difference
Residential	83,170 sqm	87,971 sqm	+ 4,801 sqm
Serviced apartments	4,801 sqm	-	- 4,801 sqm
Retail / commercial	2,894 sqm	2,894 sqm	-
Child care	598 sqm	598 sqm	-
Total	91,463 sqm	91,463 sqm	-

[Note. The GFA and FSR calculations in Table 3 assume the determination and approval of DA/789/2021 for the conversion of 122 serviced apartments to residential apartments at Levels 13-30]

Internal Design and Layout

The indicative concept proposal does not involve any physical changes or modifications to the internal layout or configuration of the MSA suites at Levels 03-12 (as approved and constructed).

Indicative floor plans for the residential apartments at Levels 03-12 are provided at **Appendix B**.

Dwelling Mix

The indicative proposal provides the following residential apartment mix at Levels 03-12 of the South Tower:

- 16 x studio apartments
- 35 x one-bedroom apartments
- 9 x two-bedroom apartments

Total: 60 residential apartments

Residential Apartment Size

The sizes of the residential apartments are as follows.

Table 6 Apartment Sizes

Apartment	Size
Studio apartments	39 – 44 sqm
One-bedroom apartments	50 – 52 sqm
Two-bedroom apartments	80 – 88 sqm

The residential apartments are consistent with ADG requirements for the minimum size of rooms.

The apartments have external balconies that satisfy the minimum private open space areas of the ADG.

Car Parking

The indicative proposal would retain the existing car parking spaces allocated to the 60 MSA suites at basement levels. The car parking allocation to the proposed residential apartments will be as follows:

The parking rates for residential apartments and MSA are the same and are all built in accordance with the LEP and existing approved development consent. Parking will be allocated and addressed in a future DA.

Environmentally Sustainable Development

The MSA suites are designed to achieve appropriate energy saving and water efficiency measures. A future development application for the residential apartments will be accompanied by a BASIX assessment.

5. STATUTORY PLANNING CONTEXT

5.1. PARRAMATTA LOCAL ENVIRONMENTAL PLAN 2011

The Parramatta Local Environmental Plan 2011 (LEP) is the principal environmental planning instrument applying to the site and the proposed development.

5.1.1. Land Use Zoning

Pursuant to the LEP, the site is zoned B4 Mixed Use (refer to **Figure 3**).

Figure 3 Land Zoning



Source: Urbis

Table 7 identifies the objectives and permissible land uses for Zone B4.

Table 7 B4 Zone Objectives and Permissible Uses

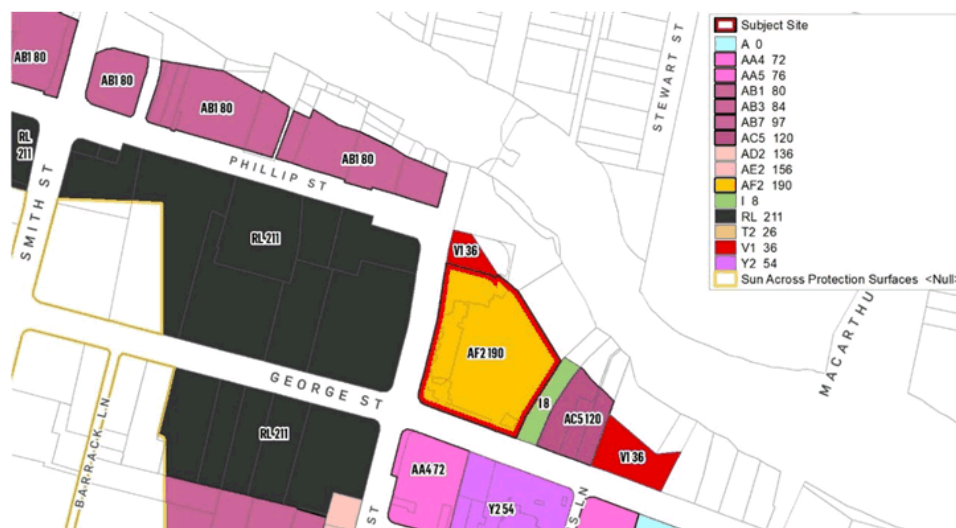
LEP	B4 Zone
Zone Objectives	<ul style="list-style-type: none"> To provide a mixture of compatible land uses. To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling. To encourage development that contributes to an active, vibrant and sustainable neighbourhood. To create opportunities to improve the public domain and pedestrian links. To support the higher order Zone B3 Commercial Core while providing for the daily commercial needs of the locality. To protect and enhance the unique qualities and character of special areas within the Parramatta City Centre.

LEP	B4 Zone
Permitted without consent	Home occupations
Permitted with consent	Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Commercial premises; Community facilities; Educational establishments; Entertainment facilities; Function centres; Hotel or motel accommodation; Information and education facilities; Light industries; Medical centres; Oyster aquaculture; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Roads; Seniors housing; Shop top housing; Tank-based aquaculture; Water recycling facilities; Any other development not specified in item 2 or 4
Prohibited	Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Crematoria; Depots; Dual occupancies; Dwelling houses; Eco-tourist facilities; Electricity generating works; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Heavy industrial storage establishments; Helipads; Highway service centres; Home industries; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Jetties; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Pond-based aquaculture Port facilities; Recreation facilities (major); Research stations; Rural industries; Rural workers' dwellings; Secondary dwellings; Semi-detached dwellings; Sewerage systems; Sex services premises; Signage; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies

5.1.2. Building Height

The site is subject to a maximum building height of 190 metres under the LEP (refer **Figure 4**).

Figure 4 LEP Building Height

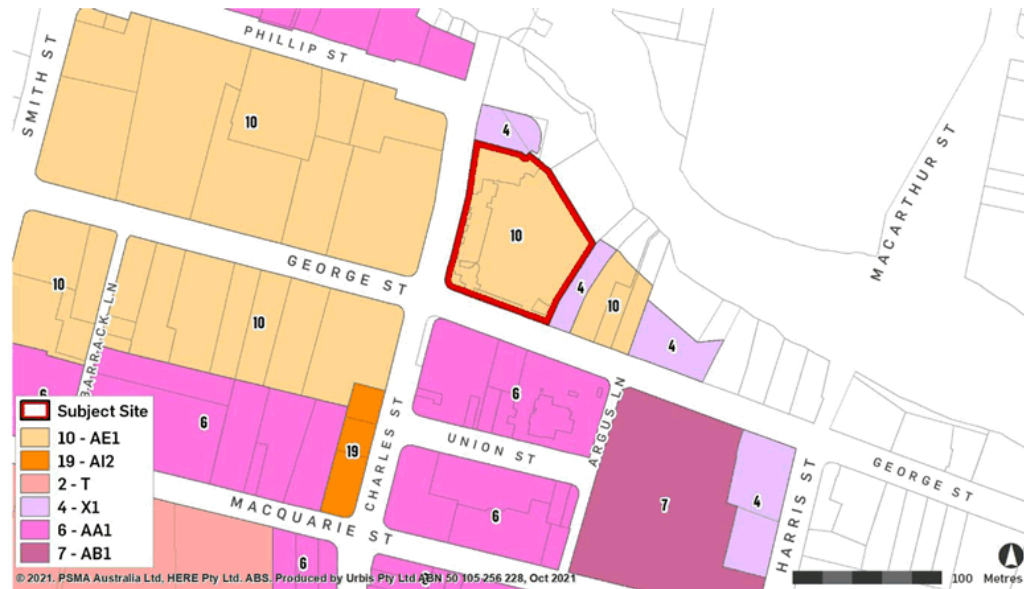


Source: Urbis

5.1.3. Floor Space Ratio

The site has a maximum floor space ratio (FSR) of 10:1 under the LEP (refer **Figure 5**).

Figure 5 LEP Floor Space Ratio



Source: Urbis

5.1.4. Heritage Conservation

The site is not identified as a local heritage item, nor is it located within a heritage conservation area. The site adjoins a State-listed heritage item (Harrisford) at 182 George Street (ID: I00248) (refer to **Figure 6**).

Figure 6 LEP Heritage Conservation



Source: Urbis

5.1.5. Additional Local Provisions – Parramatta City Centre

The site is located within the Parramatta City Centre (as identified on the Additional Local Provisions Map) to which LEP Part 7 applies. The additional local provisions that apply to the site are summarised in **Table 8**.

Table 8 LEP Additional Local Provisions

LEP Control	Provision	Comment
Clause 7.2 Floor space ratio	The Clause prescribes a maximum FSR for development on land of certain areas.	The Planning Proposal is unaffected by the provisions of Clause 7.2.
Clause 7.3 Car parking	The Clause prescribes maximum car parking rates for certain land uses.	The Planning Proposal is unaffected by the provisions of Clause 7.3. The proposal does not involve any changes to the approved car parking provision.
Clause 7.4 Sun access	The Clause seeks to protect public open space in Parramatta Square, the Lancer Barracks site, and Jubilee Park from overshadowing.	The Planning Proposal will not result in any additional overshadowing to these public open spaces.
Clause 7.5 Serviced apartments	The Clause requires development on land in Zone B4 Mixed Use for the purpose of the strata subdivision of a building or part of a building that is or has been used for serviced apartments to satisfy the design quality principles of SEPP 65 and design principles of the Apartment Design Code.	The Planning Proposal will enable the conversion of approved serviced apartments to residential apartments. The residential apartments will achieve compliance with the design quality principles of SEPP 65 and design criteria of the Apartment Design Code.
Clause 7.10 Design excellence	The Clause seeks to deliver the highest standard of architectural, urban and landscape design. It applies to development involving the erection of a new building in the Parramatta City Centre.	The original DA (480/2018) utilised the design excellence provisions of Clause 7.10, triggering the following bonuses: <ul style="list-style-type: none"> ▪ Building height bonus – 15% (increase from 190m to 218.5m); ▪ Floor space ratio bonus – 15% (increase from 10:1 to 11.5:1). The Planning Proposal is unaffected by the provisions of Clause 7.10.
Clause 7.12 Development on land at 180 George Street Parramatta	Clause 7.12 applies to the site. The Clause is a site-specific provision which requires a building on the site to achieve a minimum 1:1 FSR for defined non-residential uses, being: 'commercial premises'; 'tourist and visitor accommodation'; 'centre-based child care facilities'; and 'serviced apartments'.	The intended outcome of this Planning Proposal is to amend Clause 7.12 to reduce the minimum FSR for a building used for any of the defined non-residential land uses from 1:1 to 0.43:1.

5.2. PARRAMATTA CBD PLANNING PROPOSAL

Council is in the process of finalising the Parramatta CBD Planning Proposal (**CBD PP**) to implement the Parramatta CBD Planning Strategy adopted in 2015 (Planning Proposal Reference: PP-2020-2616).

- The PP applies to land collectively referred to as the 'Parramatta CBD' (this includes the subject site).
- The CBD PP seeks changes to the CBD boundary, land use mix and primary built form planning controls in order to facilitate the delivery of an extra 46,000 jobs and **14,000 dwellings over the next 40 years**.
- The new statutory planning framework under the amended LEP will expand and intensify commercial activities and support higher density mixed use and residential development.
- The new planning framework will facilitate and strengthen the Parramatta CBD as a metropolitan centre.
- The CBD PP aligns with the vision of the Parramatta CBD Planning Strategy 2015 and gives effect to the priorities and actions of the Central City District Plan to manage growth in the context of economic, social, and environmental matters and grow a stronger and more competitive Greater Parramatta.

The below provides a summary of the timeline and current status of the CBD PP:

- The CBD PP was exhibited for public consultation for six weeks in September to November 2020.
- In response to submissions received, requested changes were assessed by Council as follows:
 - Support proposed changes that have strategic planning merit (Decision Pathway 1)
 - Reject proposed changes that have no strategic planning merit (Decision Pathway 2)
 - Merit in further investigation as part of a separate process (Decision Pathway 3).
- Council chose to progress the CBD PP, with only minor amendments to avoid re-exhibition.
- On 11 May 2021, the Parramatta Local Planning Panel (**LPP**) considered the Submissions report and a revised CBD PP made in response to the public exhibition. The LPP recommended Council to:
 - Approve the revised CBD PP and forward it to DPIE for finalisation.
 - Further investigate some of the requested changes from the submissions (that have merit).
 - Request DPIE to exempt Build to Rent housing in the B3 Commercial Core zone.
 - Approve the preparation of a new Section 7.12 development contributions plan for the Parramatta CBD to be approved within 12 months, including a new levy rate set higher than the current 3% of the cost of new developments.
- On 24 May 2021, Council determined to defer the finalisation of the CBD PP on the basis that some councillors had not fully reviewed the latest documentation and submissions.
- On 15 June 2021, Council resolved to approve the Parramatta CBD Planning Proposal with minor changes and forward it to the Department of Planning, Industry and Environment (**DPIE**) for finalisation.
- The revised CBD PP documentation was submitted to DPIE on 1 July 2021. The initial date for DPIE to finalise the LEP amendment was 30 September but this has been delayed.

From a statutory planning perspective, the gazettal of the CBD PP is imminent and certain.

The CBD PP applies the following provisions / planning control changes to the site (180 George Street):

- **Zoning** – B4 Mixed Use (no change).
- **Building Height** – 190 metres (no change).
- **Incentive Building Height** – N/A.
- **Floor Space Ratio** –10:1 (no change).

- **Incentive Floor Space Ratio** – N/A.
- **Heritage** – Adjoining local heritage item (Harrisford) (ID: I00248).
- **Land Reservation / Acquisition** – no change.
- **Sun Access Protection** – no overshadowing to Parramatta River Foreshore.
- **Opportunity Sites** – N/A.
- **Additional Local Provision:** Minimum Commercial Provision – Site subject to Clause 7.6C(4):
 - The objective of this clause is to facilitate commercial premises in Zone B4 Mixed Use.
 - The consent authority may grant consent to development comprising wholly of non-residential development commercial premises in Zone B4 Mixed Use up to the floor space ratio as specified on the Incentive Floor Space Ratio Map and the height of building as specified on the Incentive Height of Building Map without the need to comply with the key include community infrastructure.
- **Special Provision Areas Designation** – Site identified as Area 6 (Clause 7.12 of current LEP applies).
- **Active Street Frontage** – Required along frontages to Charles Street and George Street.
- **Additional Permitted Uses** – N/A.
- **Floodplain Risk Management Area** – Clause 7.6L seeks to enable occupants of buildings in identified areas that have particular evacuation or emergency response issues to:
 - shelter within a building above the probable maximum flood level; or
 - evacuate safely to land located above the probable maximum flood level.
- **High Performing Buildings** – Specific development (including certain residential criteria) triggers higher BASIX Energy and BASIX Water standards relative to both FSR and number of storeys of the building (this is an optional provision where developers can obtain the benefit of a bonus 5% FSR).

In summary, the CBD PP does not seek any amendments to the primary planning controls that apply to the site. The site-specific Clause to which the subject Planning Proposal relates is unaffected by the CBD PP.

5.3. PARRAMATTA DEVELOPMENT CONTROL PLAN

The Parramatta Development Control Plan 2011 (DCP) applies to the subject site. There are no specific controls in the DCP that relate to the proposed amendment to the LEP for change of use of Levels 03-12.

More generally, development at the site is subject to the following parts of the DCP:

- Part 2 - Site Planning
- Part 3 - Development Principles
- Part 4 - Special Precincts
 - The site is located within the Parramatta City Centre to which Section 4.4.3 applies. Specific provisions relate to building form, mixed use buildings, public domain and pedestrian amenity, views and view corridors, access and parking, environmental management, and design excellence

A future DA for the proposal will be assessed against the relevant provisions of the DCP.

5.4. PLANNING AGREEMENTS

[The original Planning Proposal for the site was supported by a Voluntary Planning Agreement (VPA) to deliver financial contributions and public access easements at the ground level. The VPA and associated obligations are not affected by this Planning Proposal.

6. PLANNING PROPOSAL ASSESSMENT

The Planning Proposal request has been prepared in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979 (**EP&A Act**) and the Department of Planning, Industry and Environment (**DPIE**) guidelines '*Planning Proposals: A guide to preparing planning proposals*' (dated December 2018).

Accordingly, the Planning Proposal is assessed in the following parts:

- Part 1 – A statement of the objectives and intended outcomes.
- Part 2 – An explanation of the provisions that are to be included in the proposed LEP.
- Part 3 – The justification for the Planning Proposal and the process for the implementation.
- Part 4 – Mapping.
- Part 5 – Details of community consultation that is to be undertaken for the Planning Proposal.
- Part 6 – Project timeline.

Discussion for each of the above parts is outlined in the following chapters.

7. PART 1 – OBJECTIVE AND INTENDED OUTCOMES

7.1. INTENDED OBJECTIVE

The intended objective of this Planning Proposal is to amend the site-specific provisions of Clause 7.12 of the Parramatta Local Environmental Plan 2011 (LEP) to reduce the minimum floor space ratio (FSR) for a building on the land used for any of the defined non-residential land uses from 1:1 to 0.43:1. The proposed amendment to the LEP will enable the change of use of the 60 MSA suites to residential apartments.

Importantly, the Planning Proposal does not seek any change to the existing B4 Mixed Use zoning of the site, the height of building development standard (190 metres) or FSR development standard (10:1), or any other LEP controls or provisions. The proposal simply seeks to amend a site-specific provision in order to reduce the minimum FSR for defined non-residential land uses and enable the conversion of 60 MSA suites, which otherwise would remain unoccupied and prevent orderly, economic, and efficient use of the land.

7.2. EXPLANATION OF OBJECTIVE

As a consequence of the Covid-19 pandemic, the long-term commercial operation of MSA at the subject site is forecast to be economically unsustainability. The social and economic outcome of the pandemic have significantly impacted conventional business practices and the hospitality and tourism travel sectors.

By way of direct comparison, in the year prior to Covid-19, the existing MSA operation at 330 Church Street, Parramatta ('Altitude') performed strongly, with an average occupancy rate of 91% recorded for the year. During the second (and longest) lockdown period in Greater Sydney (from June 2021 to October 2021), MSA Parramatta recorded its lowest occupancy rate at 38%, reflecting a dramatic 53% decrease from pre Covid-19 levels. It is forecast that the economic and social changes as a consequence of Covid-19 will constrain future visitation growth and short-stay accommodation demand.

Accordingly, Meriton has investigated a range of alternative viable and employment-generating land uses for the 60 MSA suites at Levels 03-12 of the South Tower to respond to the economic impacts of the pandemic and avoid the underutilisation of this significant mixed use asset within the Parramatta CBD. The repurposing of Levels 03-12 for an alternative land use is critical to ensuring the long-term economic viability of the site.

However, physical construction and internal fit-out of Levels 03-12 for the approved MSA use is complete, and the floor plate configuration, floor-to-ceiling heights, and location of structural columns do not facilitate the practical conversion or adaptation of these levels to any alternative viable land use. The only economically feasible alternative land use for the MSA suites at Levels 03-12 is residential accommodation.

The conversion to residential apartments at Levels 03-12 will result in the following FSR and GFA changes.

Table 9 GFA / FSR Summary

Land Use	Approved Development *		Proposed Conversion of MSA Suites	
	Gross Floor Area	Floor Space Ratio	Gross Floor Area	Floor Space Ratio
Residential	83,170 sqm	10.43:1	87,971 sqm	11.03
Serviced apartments	4,801 sqm	0.6:1	-	-
Retail	2,894 sqm	0.36:1	2,894 sqm	0.36:1
Child care	598 sqm	0.07:1	598 sqm	0.07:1
Total	91,463 sqm	11.46:1	91,463 sqm	11.46:1

* The GFA and FSR calculations in Table 9 assume the determination and approval of DA/789/2021 for the conversion of 122 serviced apartments to residential apartments at Levels 13-30

Clause 7.12 of the Parramatta LEP 2011 applies to development on the subject site (being land marked "Area 6" on the LEP Special Provisions Area Map). The Clause provides as follows:

(2) Despite clauses 4.4 and 7.2, the minimum floor space ratio for a building on land to which this clause applies that is used for any of the following purposes is 1:1—

- (a) commercial premises,*
- (b) tourist and visitor accommodation,*
- (c) centre-based child care facilities,*
- (d) serviced apartments.*

As detailed in **Table 5**, the conversion of the 60 MSA suites to residential apartments will result in:

- Total residential GFA: 87,971 sqm (FSR – 11.03:1)
- Total non-residential GFA: 3,492 sqm (FSR – 0.43:1)

Accordingly, the resultant FSR for the defined non-residential land uses does not comply with the minimum 1:1 FSR pursuant to Clause 7.12(2).

Clause 4.6 of the LEP provides an appropriate degree of flexibility in applying certain development standards to particular development to achieve a better planning outcome. However, Clause 4.6(8) does not allow consent to be granted to development that would contravene the FSR development standard under Clause 7.12 by more than 5%. The resultant non-compliance of the proposed conversion against the development standard of Clause 7.12 exceeds 5%. Therefore a Clause 4.6 variation cannot be applied.

The intended outcome of this Planning Proposal is to amend Clause 7.12 to reduce the minimum FSR for a building on the land used for any of the defined non-residential land uses to 0.43:1. Importantly, the Planning Proposal does not seek any change to the existing B4 Mixed Use zoning of the site, the height of building development standard (190 metres) or FSR development standard (10:1), or any other LEP controls or provisions. The proposal simply seeks to amend a site-specific provision in order to reduce the minimum FSR for defined non-residential land uses and enable the conversion of serviced apartments, which otherwise would remain unoccupied and prevent orderly, economic, and efficient use of the land.

This report has been prepared to assist Council in the preparation of a Planning Proposal to amend the site-specific Clause 7.12 of the Parramatta LEP 2011, in accordance with Section 3.33 of the EP&A Act.

8. PART 2 – EXPLANATION OF PROVISIONS

8.1. LAND TO WHICH THE PLAN WILL APPLY

The land that is proposed to be included in the LEP amendment is 180 George Street, Parramatta. The legal property description of the site is Lots 201, 202, 203, and 204 in DP 1082194 and SP 74916.

8.2. PROPOSED LEP AMENDMENT

This Planning Proposal seeks to an amendment to Clause 7.12(2) of the LEP as follows:

- (1) *This clause applies to land marked “Area 6” on the Special Provisions Area Map.*
- (2) *Despite clauses 4.4 and 7.2, the minimum floor space ratio for a building on land to which this clause applies that is used for any of the following purposes is 0.43:1—*
 - (a) *commercial premises,*
 - (b) *tourist and visitor accommodation,*
 - (c) *centre-based child care facilities,*
 - (d) *serviced apartments.*

This Planning Proposal does propose any amendments to the provisions of Clause 7.12(3) or (4).

9. PART 3 – STRATEGIC JUSTIFICATION

9.1. NEED FOR THE PLANNING PROPOSAL

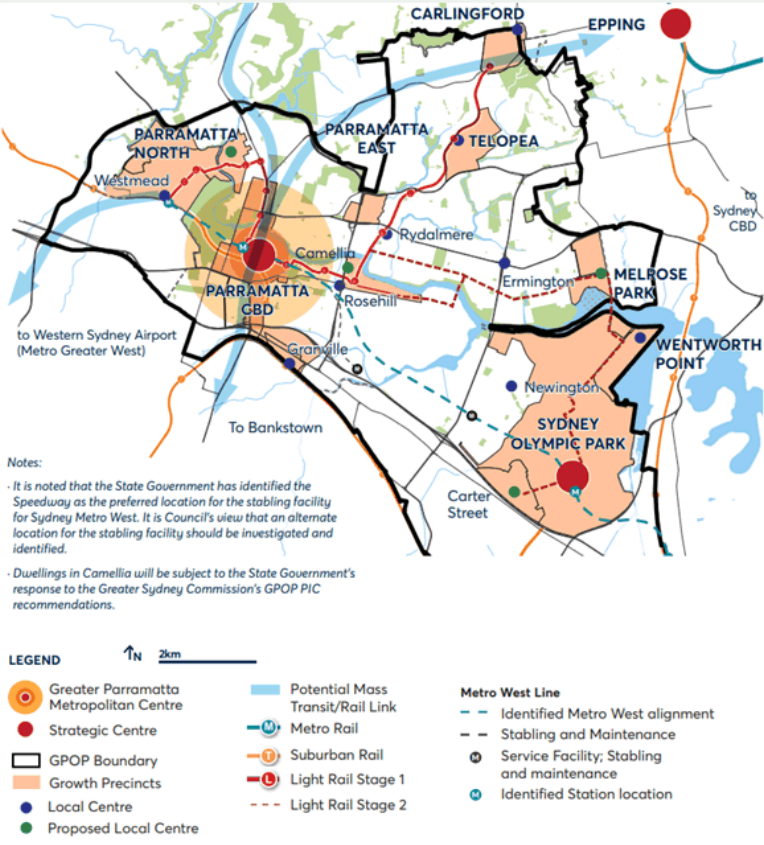
Q1. Is the planning proposal a result of an endorsed local strategic planning statement, strategic study or report?

Yes. The proposal is consistent with the strategic directions of the following endorsed local strategic plans:

- Parramatta Local Strategic Planning Statement;
- Parramatta CBD Planning Strategy;
- Parramatta Housing Strategy; and
- City of Parramatta Community Infrastructure Strategy.

Table 10 Local Planning Strategies

Local Planning Strategies	Consistency
Parramatta Local Strategic Planning Statement	<p>Local Strategic Planning Statements (LSPS) are a new layer of strategic planning legislated by the EP&A Act and introduced in March 2018. The LSPS is intended to provide more certainty about future land use intentions of a local government area (LGA). A Council must consider its LSPS as part of the LEP making process.</p> <p>The LSPS prepared by the City of Parramatta was endorsed in March 2020. It outlines the role of Parramatta as part of Greater Sydney and establishes key planning priorities aligned with the three pillars of the Greater Sydney Region Plan – <i>A Metropolis of Three Cities</i> (being liveability, productivity, and sustainability).</p> <p>The purpose of the Parramatta LSPS is to guide land use planning within the LGA over the next 20 years. The vision for Parramatta is stated in the LSPS as follow:</p> <p><i>In 20 years Parramatta will be a bustling, cosmopolitan and vibrant metropolis, the Central City for Greater Sydney. It will be a Smart City that is well connected to the region, surrounded by high quality and diverse residential neighbourhoods with lots of parks and green spaces. It will be innovative and creative and be well supported by strong, productive and competitive employment precincts. It will be a place that people will want to be a part of."</i></p> <p>The Parramatta LSPS sets out:</p> <ul style="list-style-type: none"> ▪ the 20-year vision for land use in the local area; ▪ the special characteristics which contribute to local identity; ▪ shared community values to be maintained and enhanced; and ▪ how growth and change will be managed into the future. <p>The LSPS Structure Plan identifies the subject site within the Greater Parramatta Metropolitan Centre. The Metropolitan Centre encompasses the Parramatta CBD and is considered the core of the Central River City, which provides a transition between the well-established Eastern Harbour City and the future Western Parkland City.</p> <p>The proposal contributes to the urban renewal of the locality by providing additional residential accommodation within close proximity to jobs, services, and amenities.</p>

Local Planning Strategies	Consistency
	<p>Parramatta LSPS Structure Plan: <i>Towards 2036</i></p>  <p>Notes:</p> <ul style="list-style-type: none"> It is noted that the State Government has identified the Speedway as the preferred location for the stabling facility for Sydney Metro West. It is Council's view that an alternate location for the stabling facility should be investigated and identified. Duellings in Camellia will be subject to the State Government's response to the Greater Sydney Commission's GPOP PIC recommendations. <p>LEGEND</p> <ul style="list-style-type: none"> Greater Parramatta Metropolitan Centre Strategic Centre GPOP Boundary Growth Precincts Local Centre Proposed Local Centre Potential Mass Transit/Rail Link Metro Rail Suburban Rail Light Rail Stage 1 Light Rail Stage 2 Metro West Line Identified Metro West alignment Stabling and Maintenance Service Facility; Stabling and maintenance Identified Station location <p>The objective of the Planning Proposal to facilitate additional residential apartments is consistent with key planning priorities and actions of the LSPS, as summarised below.</p> <p>Planning Priority 1: Expand Parramatta's economic role as the Central City of Greater Sydney</p> <p>The overall mixed use development will reinforce Greater Parramatta's role as the Central City. The approved commercial uses will support 133 direct on-site jobs and a further 28 indirect jobs through flow-on economic multiplier effects. This use will contribute around \$15 million gross value add to the local economy each year.</p> <p>The additional apartments have the potential to support approximately 160 new residents within the CBD. Additional residents will contribute net economic benefits and support the growth of Parramatta's night time economy, including an additional \$2.2 million of annual retail spending, to the benefit of existing and new businesses.</p> <p>Future residential occupants will contribute activation and social vibrancy, particularly throughout the pedestrian public domain around Charles Street and George Street and contribute to the creation of a lively local neighbourhood with interest and vitality.</p>

Local Planning Strategies	Consistency
	<p>Planning Priority 4. <i>Focus housing and employment growth in the GPOP and Strategic Centres; as well as stage housing release consistent with the Parramatta Local Housing Strategy</i></p> <p>The proposal aligns with the directions of Planning Priority 4 in that it delivers new housing with an approved high-rise development in the CBD. This is consistent with the Structure Plan which identifies the majority of housing growth over the next 20 years to be delivered in the Greater Parramatta and the Olympic Park (GPOP).</p> <p>Planning Priority 7. <i>Provide for a diversity of housing types and sizes to meet community needs into the future</i></p> <p>The Planning Proposal will deliver a range of housing types and sizes that cater to the Parramatta community to ensure housing diversity, consistent with the Parramatta Local Housing Strategy. The typology of the proposed apartments (studios, one-bedroom, and two-bedroom units) will deliver housing diversity in the right place to respond to demand for different housing types, tenure, price points, and design.</p>
<p>Parramatta CBD Planning Strategy 2015</p>	<p>The Parramatta CBD Planning Strategy 2015 (CBD Planning Strategy) was adopted on 27 April 2015. The objectives of the CBD Planning Strategy are as follows:</p> <ul style="list-style-type: none"> ▪ set the vision for the growth of the Parramatta CBD as Australia's next great city. ▪ establish principles and actions to guide a new planning framework for the Parramatta CBD. ▪ provide a clear implementation plan for delivery of the new planning framework for the Parramatta CBD. <p>The CBD Planning Strategy identifies actions and technical studies to inform new planning controls and amendments to the LEP. Key actions of the Strategy are to:</p> <ul style="list-style-type: none"> ▪ investigate the potential expansion of the CBD boundaries; ▪ conduct detailed testing of the proposed FSR controls; ▪ remove any height controls, except in some key areas; ▪ investigate potential sun access controls to key public spaces; ▪ investigate impacts of expanding the commercial core and potentially opening it up to some residential uses (subject to commercial also being provided); ▪ set an employment growth target of 27,000 additional jobs and residential growth target of 7,500 additional dwellings by 2036; ▪ investigate infrastructure needs, including funding mechanisms; and ▪ promote tower slenderness and design excellence. <p>As detailed in Section 5.2, Council is in the process of finalising the Parramatta CBD Planning Proposal to implement the vision of the CBD Planning Strategy. This will give effect to the priorities and actions of the Central City District Plan to manage growth in the context of economic, social, and environmental matters and grow a</p>

Local Planning Strategies	Consistency
	<p>stronger and more competitive Greater Parramatta. The gazettal of the CBD PP is imminent and certain.</p> <p>To the extent relevant, the Planning proposal is generally consistent with the relevant actions that relate to employment and jobs targets and residential growth targets as expressed in the CBD Planning Strategy (and the CBD Planning Proposal).</p> <p>The conversion of the 60 MSA suites will only result in a loss of five full-time jobs. Some 3,492 sqm of employment-generating uses will be retained on the site including retail, food and beverage, a childcare centre, and a supermarket that will generate new jobs. The ongoing operations of these uses will support 133 jobs; the conversion of 60 MSA will only result in a 4% reduction in jobs. In addition to the 133 direct on-site jobs, the ongoing operation of the other uses is forecast to support a further 28 indirect jobs through flow-on economic multiplier effects. The continued operations will deliver around \$15 million gross value add to the local economy each year.</p> <p>Around 400 - 500 jobs will continue to be generated by the development during the construction period. The residential apartments generally require the same high level of design as serviced apartments; therefore the construction cost will remain largely unchanged. In effect, the supported jobs and economic contribution to the local economy will remain equal between the approved development and the proposal.</p> <p>The provision of 60 additional residential apartments aligns with the residential growth target to deliver 7,500 additional dwellings by 2036. The proposal will deliver a mix of residential typologies (studios, one-bedrooms, and two-bedroom units) that responds to the demand for residential choice and diversity in the CBD.</p>
Parramatta Housing Strategy	<p>The City of Parramatta Local Housing Strategy (Housing Strategy) (adopted July 2020) provides direction at the local level about when and where future housing growth will occur and how it aligns with the broader NSW government strategic objectives identified in the Sydney Region Plan and Central City District Plan.</p> <p>The Housing Strategy confirms that Parramatta will achieve the dwellings targets identified in the Central City District Plan and that the majority of new housing growth (83%) will be delivered in the 13 precincts around employment and transport.</p> <p>The objectives of the Housing Strategy relevant to the Planning Proposal include:</p> <ul style="list-style-type: none"> ▪ Housing delivery is aligned and sequenced with existing transport and capacity improvements. ▪ Growth precincts innovate excellence in place-based outcomes with diverse and affordable housing to suit residents' needs. ▪ Housing delivery complements, not compromises, the economic significance of both the Central City and the City of Parramatta. ▪ Additional housing is focussed on growth precincts, aligned with transport infrastructure delivery to facilitate residents' access to facilities, services, social connections and jobs. <p>The conversion of the serviced apartments to residential apartments will deliver additional housing with mix of typologies to achieve an improved 'place-based' outcome for the site. Future residents will benefit from the site's strategic location on</p>

Local Planning Strategies	Consistency
	<p>the fringe of the Parramatta CBD and its immediate (walking) proximity to significant employment opportunities, convenience retail, employment opportunities, community amenities, health services, and existing and future public transport infrastructure.</p> <p>The proposal will not materially compromise economic activity at the site. The approved employment-generating uses will support 133 direct on-site jobs and 28 indirect jobs through flow-on economic multiplier effects. The continued operations will deliver around \$15 million gross value add to the local economy each year. The 400 - 500 jobs generated during construction will remain largely unchanged.</p>
<p>City of Parramatta Community Infrastructure Strategy</p>	<p>The Community Infrastructure Strategy has limited applicability to the Planning Proposal. The future DA will consider the Community Infrastructure Strategy, in particular key findings which identify a transition towards high density living.</p> <p>The provision of a range of dwelling typologies will respond to a gap in the housing market in the CBD and respond to the changing demographic characteristics. The Parramatta Community Infrastructure Plan identifies a growing population of people in the 25-29 age groups who are part of family households, which will likely lead to changing housing types and tenures, with an increasing proportion of renters and increasing proportion of people living in high density.</p>

Q2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Yes. Without an amendment to the site-specific statutory planning control that prescribes a minimum FSR for defined non-residential land uses, the proposed conversion of serviced apartments to residential apartments cannot be achieved and the associated social and economic benefits cannot be realised.

The following alternative scenarios were considered to give effect to and achieve the objectives of the Planning Proposal. However, these were not pursued as the best means to achieve the intended outcome.

- Lodging a development application under the current LEP planning controls; and
- 'Do nothing'.

Development Application

Lodging a development application was considered as the site's B4 Mixed Use zoning permits 'residential accommodation'. However, as detailed in **Table 9**, the conversion of the 60 MSA suites to residential apartments will result in a FSR for the defined non-residential uses of 0.43:1. The resultant FSR for the defined non-residential land uses would not comply with the minimum 1:1 FSR pursuant to Clause 7.12(2).

Clause 4.6 of the LEP provides an appropriate degree of flexibility in applying certain development standards to particular development to achieve a better planning outcome. However, Clause 4.6(8) does not allow consent to be granted to development that would contravene the FSR development standard under Clause 7.12 by more than 5%. The resultant non-compliance of the proposed conversion against the development standard of Clause 7.12 exceeds 5%. Therefore it would not be appropriate nor expected that legal powers exist within the intent of Clause 4.6 that could be used and support a variation to Clause 7.12.

Do Nothing

As detailed in **Section 7.2**, Covid-19 has impacted the long-term economic viability and sustainability of the MSA suites at the subject site. The social and economic outcome of the pandemic has significantly altered conventional business practices and the hospitality and tourism travel sectors.

Meriton has investigated a range of alternative viable and employment-generating land uses for the serviced apartments to respond to the economic impacts of the pandemic and ensure the long-term economic viability of the site. However, the floor plate configuration, floor-to-ceiling heights, and location of structural columns of the services apartments do not facilitate the practical conversion or adaptation of these levels to any alternative viable land use. The only economically feasible alternative land use is residential accommodation.

The option not to pursue the Planning Proposal and allow Levels 03-12 to remain unoccupied would represent an inefficient use of constructed residential floor space and a poor urban planning outcome. The underutilisation of this significant mixed use CBD asset is wholly contrary to the objectives and intent of the EP&A Act that promote the orderly, economic, and efficient use of land. The 'do nothing' option is not viable or practical.

Accordingly, the proposed amendment to Clause 7.12 of the LEP is the best means of achieving the objectives or intended outcomes. It would enable the timely conversion of serviced apartments to residential apartments and realise the associated social and economic benefits.

9.2. RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK

9.2.1. Guide to Preparing Planning Proposals – Assessment Criteria

The Planning Proposal demonstrates both strategic and site-specific planning merit in accordance with the Assessment Criteria in *A guide to preparing planning proposals* (DPIE, December 2018). **Table 11** below contains an assessment of the Planning Proposal against the Guide.

Table 11 Guide to Preparing Planning Proposals Assessment Criteria

Assessment Criteria	Response
<p><i>Does the proposal have strategic merit? Will it:</i></p> <ul style="list-style-type: none"> <i>give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or</i> 	<p>Yes. The Planning Proposal has strategic merit in that it gives effect to the directions and planning priorities of the Greater Sydney Region Plan – <i>A Metropolis of Three Cities</i> and Central City District Plan (refer to Table 12).</p> <p>The strategic merits of the proposal are detailed in Section 9.2.2.</p>
<ul style="list-style-type: none"> <i>give effect to a relevant local strategic planning statement or strategy that has been endorsed by the Department or required as part of a regional or district plan or local strategic planning statement; or</i> 	<p>Yes. The Planning Proposal has strategic merit in that it gives effect to relevant endorsed local strategic plans, including the Parramatta Local Strategic Planning Statement, the Parramatta CBD Planning Strategy, the Parramatta Housing Strategy, and the City of Parramatta Community Infrastructure Strategy (refer to Table 10).</p>
<ul style="list-style-type: none"> <i>respond to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing strategic plans.</i> 	<p>Yes. The Planning Proposal responds to a change in economic circumstances and trends in business and tourism travel as a direct consequence of Covid-19.</p> <p>The site-specific LEP provision to which the Planning Proposal relates was drafted and gazetted in April 2018 in the context of the prevailing economic climate at the time and conceived as part of the Parramatta CBD Strategy over a decade ago. The Clause is not fit-for-purpose in light of the dramatic economic impacts of Covid-19 on hospitality, business, and tourism sectors.</p>
<p><i>b) Does the proposal have site-specific merit, having regard to the following?</i></p> <ul style="list-style-type: none"> <i>the natural environment (including known significant environmental values, resources or hazards) and</i> <i>the existing uses, approved uses, and likely future uses of land in the vicinity of the proposal and</i> <i>the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.</i> 	<p>Yes. The site-specific merits of the proposal are detailed in Section 9.2.3.</p>

9.2.2. Strategic Merits

The Planning Proposal has strategic merits in the following regard:

- The proposal delivers an urgent, site-specific response to the social and economic consequences of Covid-19 which has resulted in significant change to conventional business practices and hospitality and tourism travel sectors. It facilitates an appropriate placed-based outcome and supports the future economic viability and sustainability of the site. The impacts of Covid-19 on short term accommodation are evident through the dramatic drop in occupancy rates across the MSA portfolio. The minor change of use on this specific site is of no strategic consequence and is otherwise not inconsistent with strategic planning policy directions. It will deliver a high quality mixed use development in an appropriate location.
- The Parramatta CBD has a robust future supply of short-term visitor accommodation. There are currently 936 hotel rooms and 346 serviced apartments within the CBD, equating to a total of 1,282 short term accommodation units. With a pipeline of 1,538 hotel rooms and 274 serviced apartments by 2027, short term accommodation units will grow to 3,094. This equates to the CBD short term accommodation supply increasing by 2.5x. The conversion of 60 MSA suites to residential apartments will only result in a 3% decrease in total supply by 2027 and instead will contribute to urgently needed housing supply.
- The short-stay accommodation sector in the CBD has been and will be significantly impacted by Covid-19 given that business travel accounts for a significant market share. As remote working conditions have flourished throughout Covid-19 (aided by advances in remote working technology), it is likely businesses will embrace remote working moving forward. Therefore it is unlikely business related travel will return to pre-Covid levels. Even as occupancy in the CBD recovers beyond 2025 and new supply is absorbed by additional demand, occupancies are expected to stay well below the sustainable occupancy rate of 75% until at least 2030 and will take even longer to return to the pre-Covid average occupancy rate of 84%.
- The site is on the periphery of the Parramatta CBD, beyond the Commercial Core (zoned B3). The Commercial Core, generally bounded by Marsden Street, Smith Street, Parramatta River, and the train line, is the employment-generating heart of the Central River City with a strategic focus for employment-generating land uses that contribute to the long term economic growth of the CBD. Strong competitive and strategic positioning is vital for short term accommodation facilities given that the supply pipeline will create intense competition, particularly as the industry recovers from Covid-19 and occupancy remains below a sustainable occupancy rate. The site's location on the periphery of the CBD presents a relatively weak competitive positioning for serviced apartments. The majority of existing and future short-term visitor accommodation offerings within the CBD are better placed to proceed, with close proximity to the Parramatta train station and access to retail, food and beverage offerings, entertainment, and offices.
- Due to its relatively limited scale, Meriton has always proposed that the MSA operation at 180 George Street site would serve as a satellite overflow offering to the existing operation at 330 Church Street, Parramatta ('Altitude'). All administration, servicing, maintenance, or cleaning jobs associated with MSA suites on the subject site would be managed from the existing Altitude operation. Benchmarked against rates for full-time staff per room across the MSA portfolio, the conversion of 60 MSA suites will only result in a loss of five full-time jobs (4% reduction of total jobs on site).
- The site will retain some 3,492 sqm of employment-generating uses (including retail, food and beverage, a child care centre, and a supermarket). Based on industry standard job density benchmarks, these uses will support 133 direct on-site jobs. Furthermore, the operation of the other commercial uses is forecast to support a further 28 indirect jobs through flow-on economic multiplier effects. The continued operations will deliver around \$15 million gross value add to the local economy each year. Around 400 - 500 jobs will continue to be generated by the proposed development during the construction period. With residential apartments requiring the same high level of design as serviced apartments, the construction cost will remain largely unchanged. In effect, the supported jobs and economic contribution to the local economy is equal to the original development approval.
- There is expected to be a considerable oversupply of 962 short term accommodation in 2030. This indicates there will be no loss of tourists within the CBD, as they will be easily catered for by other high quality developments. The additional 60 residential apartments have potential to support around 160 residents within the CBD. These residents will bring in additional \$2.2 million of annual retail spending that will benefit existing and new businesses. This additional spending will far outweigh the potential economic loss to the local economy from losing five ongoing jobs, and no change to tourists spending.

- The provision of additional residential apartments aligns with the State Government target to provide 14,000 new dwellings within the Parramatta CBD over the next 40 years. At a District level, the proposal will contribute to the 20-year strategic target for the Central City District of 207,500 new dwellings.
- The proposal will deliver a mix of residential typologies, including studio apartments, one-bedrooms, and two-bedroom units. Different typologies will satisfy the demand for housing choice and diversity and respond to changing demographic characteristics. The proposal delivers a range of housing tenure, price points, and design. The housing typology will cater to projected future household structures, including couples, single parents, couples with children, and single persons living in high density accommodation. A mix of residential typologies will achieve an improved 'place-based' outcome that leverages the site's location within the CBD and close proximity to employment, local services, and transport infrastructure.
- Additional housing on the site responds to State Government's strategic vision to create '30-minute' cities where residents can access their metropolitan centre within 30 minutes by public transport. The site is some 650 metres (walking distance) from Parramatta train station and 380 metres from Harris Street station of the Parramatta Light Rail network, which connects Westmead and Carlingford. It also directly adjoins a Wharf Ferry stop. The site is well placed to leverage from the future transport network and projected investment and infrastructure upgrades which will increase frequency of transport services.
- The site represents an entirely logical and appropriate location for additional residential accommodation given its strategic location close to the CBD and its immediate (walking) proximity to convenience retail, employment opportunities, community health and education facilities, and public transport. Future occupants will contribute street level activation and social vibrancy throughout the pedestrian public domain, including Charles Street and George Street. An increased residential population on the site will deliver enhanced activation and net economic benefits to surrounding businesses and the wider CBD. Additional residents will contribute to a liveable, dynamic, vibrant, and sustainable neighbourhood.

9.2.3. Site-Specific Merit

The Planning Proposal has site-specific merits in the following regard:

- The site-specific provision of the LEP that imposes a minimum FSR for defined non-residential land uses was drafted and gazetted in April 2018 (2018 No 158) in the context of the prevailing economic climate at the time and conceived as part of the Parramatta CBD Strategy over a decade ago. The Clause is now not fit-for-purpose in light of the dramatic and significant economic impacts of Covid-19 on the short term accommodation industry. Until the emergence of Covid-19, the Proponent's commitment was clearly demonstrated by the original DA and the commencement of construction on the project (with a CIV of \$300 million) that continued throughout the pandemic and extensive lockdowns. This Proponent's commitment to continued construction activity on the site has maintained and secured thousands of jobs.
- The proposal does not derogate the intent and function of Clause 7.12 insofar as it retains some 3,492 sqm of defined non-residential land uses (being 'commercial premises' and 'centre-based child care facilities'). The retained employment-generating land uses are provided at ground and podium levels and include retail and business tenancies, a commercial gym (indoor recreation facility), and a child care centre. The circumstance of the proposed amendment is unique to the subject site insofar as it relates to a site-specific clause that imposes a minimum FSR control for defined non-residential uses, including 'serviced apartments'. This provision only applies to the site. Accordingly, the proposed amendment to the LEP will not create a precedent for other comparable sites on the periphery of the Parramatta CBD.
- The physical construction, internal fit-out, and service connections of the floor plates at Levels 03-12 for the approved serviced apartments use has been completed. However, the floor plate configuration, floor-to-ceiling heights, and location of structural columns do not facilitate the practical or viable adaptation of these levels to any alternative employment-generating land use, such as commercial offices. Therefore the conversion of the serviced apartments to residential accommodation is the only economically feasible option for Levels 03-12 and one which makes efficient use of the constructed apartment floor space.
- The MSA suites are capable of immediate conversion and occupancy for the purpose of 'residential accommodation'. There is no change required to the internal layout, floor plate configuration, ceiling heights, or private open spaces of the serviced apartments (as constructed) to facilitate their conversion.
- The proposal will not fundamentally change the 'nature' or 'use' of the floor space at Levels 03-12; the levels will continue to function as self-contained accommodation for occupants. The principle point of

difference is that the apartments will no longer be subject to a perceived restriction on the period of occupation and will not be regularly serviced or cleaned by the owner or manager of the building on a commercial basis. There are no restrictions on the period of occupation under the approved DA.

- The MSA suites at Levels 03-12 were originally approved and constructed to achieve a high level of compliance with the design principles of SEPP 65 and design criteria of the Apartment Design Guide, specifically with regards to solar access, natural ventilation, internal areas, private open space, safety and security, internal and external amenity, storage, floor-to-ceiling heights, and sustainability.
- The proposal does not necessitate any physical changes to the approved built form, massing, density, or external appearance, in relation to building height, gross floor area, building setbacks, building separation, the public domain, or façade design. The proposal is entirely compatible with the existing and future context of the site and will not create any amenity impacts beyond those originally approved, in relation to wind, noise, air quality, overshadowing, privacy, overlooking, view loss, or solar access.
- The site is highly urbanised, having had an established history for commercial and residential land uses. The site is free of significant natural environmental constraints that have not already been considered and assessed in the extensive rezoning process and subsequent DA approvals. Accordingly, the proposal will not have any impacts on the natural environment, in relation to sustainability, acid sulfate soils, land contamination, flood planning, flora and fauna, wind, biodiversity, water protection, or heritage.
- The proposal does not necessitate any changes to the approved vehicle access arrangements nor car parking allocated to the 60 MSA suites. In this regard, the proposal will have negligible traffic impacts.
- There are no additional construction works required to facilitate the conversion of serviced apartments to residential apartments. There will be no additional construction activity or associated negative amenity impacts (such as noise, air pollution, vibration, or construction traffic) as a consequence of the proposal.

Q3. Will the planning proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

Yes. The Planning Proposal gives effect to the objectives of the following regional and district plans:

- Greater Sydney Region Plan – *A Metropolis of Three Cities*;
- Central City District Plan; and
- Future Transport Strategy 2056.

Table 12 outlines the consistency of the Planning Proposal with the relevant regional and district plans.

Table 12 Relationship to Regional and District Plans

Regional and District Plan	Consistency
Greater Sydney Region Plan – <i>A Metropolis of Three Cities</i>	<p>In March 2018, the Greater Sydney Commission (GSC) finalised 'A Metropolis of Three Cities – Greater Sydney Region Plan' (Sydney Region Plan), as the NSW Government's metropolitan plan for Sydney. The Plan presents a strategy for managing growth and change and intends to guide infrastructure delivery over the next 40 years. The plan seeks to reposition Sydney as a metropolis of three cities – the western parkland, central river, and eastern harbour cities.</p> <p>The Plan is built on a vision where most residents live within 30 minutes of jobs, education and health facilities, services, and great places. To support the vision, the GSC has established ten (10) directions to set the aspirations for Greater Sydney over the next 40 years. These directions will be used to guide future planning policy and infrastructure decisions within Greater Sydney to 2056.</p> <p>The site is located within Parramatta at the heart of the Central River City. The vision of the Central River City is centred around Greater Parramatta and the Olympic Park (GPOP) Peninsula Economic Corridor. The Central River City will grow substantially capitalising on its location as the geographic centre of Greater Sydney. Unprecedented public and private investment will contribute new transport and other infrastructure leading to a major transformation of the Central River City.</p> <p>The following provides a detailed assessment of the consistency of the Planning Proposal with the directions and actions of the Sydney Region Plan.</p> <p><u>Direction 4: Housing the city</u></p> <p><i>Objective 10 – Greater housing supply</i></p> <p>The NSW Government has identified that 725,000 additional homes will be needed by 2036 to meet demand based on current population projections of an additional 1.7 million people in Greater Sydney. As part of this unprecedented level of supply, a range of housing types, tenures, and price points will be needed to meet demand.</p> <p>The following housing targets are identified for the Central City (2016–2036):</p> <ul style="list-style-type: none"> ▪ 0-5 year housing supply target (2016-2021): 53,500 ▪ 20-year strategic housing target (2016–2036): 207,500 <p>The Plan underlines the important role that developers will play in supporting housing outcomes. The development industry needs to continually provide new housing and translate the development capacity created by the planning system.</p>

Regional and District Plan	Consistency
	<p>The Planning Proposal will facilitate additional housing and contribute to the 20-year strategic housing target for the Central City for 207,500 new dwellings.</p> <p>The proposal will achieve a high quality urban outcome for the site and contribute to the creation of a walkable neighbourhood within the north-east fringe of the Parramatta CBD which supports active and healthy lifestyles.</p> <p><i>Objective 11 – Housing is more diverse and affordable</i></p> <p>The Plan underlines the dual social and economic role of housing across Greater Sydney. Communities require housing that meets changing demographic needs over time and provides stability. Furthermore, housing has an economic productivity role by providing housing choice and affordability for a cross-section of workers.</p> <p><u>Direction 5: A city of great places</u></p> <p><i>Objective 12 – Great places that bring people together</i></p> <p>The proposal will contribute to creating great places by co-locating additional residential accommodation with commercial and community offering services (including retail uses and a child care centre) within close proximity to established and future transport infrastructure. The proposal will achieve a great place-based outcome through enhanced walkability and liveability in an CBD urban environment.</p> <p><u>Direction 6: A well-connected city</u></p> <p><i>Objective 14 – A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities</i></p> <p>The '30-minute city' will enable residents to access jobs and services in their nearest metropolitan or strategic centre within 30 minutes by public transport, walking and/or cycling, seven days a week. This will give people better access to jobs, education, and essential community services.</p> <p>The delivery of additional residential accommodation on the site will contribute to the long-term aspiration to deliver a 30-minute city where residents can access their metropolitan centre (Parramatta CBD) within 30 minutes by public transport.</p> <p><u>Direction 9: An efficient city</u></p> <p><i>Objective 33 – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change</i></p> <p>The Planning Proposal facilitates walkable neighbourhoods and low carbon transport options given to the site's proximity to public transport, in particular its walking distance to the Parramatta railway station (650 metres) and the new Parramatta Light Rail (Harris Street station) and the multitude of bus routes.</p> <p>The site's proximity to public transport provides opportunities for future residents of the site to conveniently use public transport, thereby reducing private vehicle trip movements and contributing towards the creation of low-carbon cities.</p> <p>Specific sustainability measures for the additional residential apartments will be subject to BASIX certification as part of the future DA for the change of use.</p>

Regional and District Plan	Consistency
<p>Our Greater Sydney: Central City District Plan</p>	<p>The Central City District Plan (District Plan) is a 20-year plan to manage growth in the context of economic, social, and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.</p> <p>The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies of the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations. The vision for the Central River City is:</p> <p><i>"The vision for Greater Sydney as a metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City and a 30-minute city – means residents in the Central City District will have quicker and easier access to a wider range of jobs, housing types and activities as part of the transformation of their District. The vision will improve the District's lifestyle and environmental assets."</i></p> <p>The site is located within Greater Parramatta ('the metropolitan centre') which is identified as the core of the Central River City and Central City District.</p> <p>The consistency of the Planning Proposal with the District Plan is assessed below.</p> <p>Planning Priority C5 – Providing housing supply, choice and affordability, with access to jobs, services and public transport</p> <p>As detailed above, the proposal will facilitate additional housing and contribute to the 20-year strategic housing target for the Central City District for 207,500 new dwellings.</p> <p>The proposal aligns with Planning Priority C5 to provide housing supply with local infrastructure to create liveable, walkable, and cycle-friendly neighbourhoods. The site has direct, safe, and universally designed pedestrian and cycling connections to shops, services, and public transport. New housing will optimise and leverage from the site's proximity to existing and future public transport and infrastructure.</p> <p>The typology of the proposed apartments (studios, one-bedroom, and two-bedroom units) will deliver housing diversity in the right place to respond to demand for different housing types, tenure, price points, and design. The housing typology will cater to projected household structures in the period between 2016 – 2036, including couples, single parents, couples with children, and single persons.</p> <p>Planning Priority C9 – Delivering integrated land use and transport planning and a 30-minute city</p> <p>The vision for Greater Sydney is one where people can access jobs and services in their nearest metropolitan and strategic centre. Planning Priority C9 focuses on development of more accessible and walkable neighbourhoods. Potentially indicators for this are percentage of dwellings located within 30 minutes by public transport of a metropolitan centre / cluster or strategic centre.</p>

Regional and District Plan	Consistency
	<p>Additional residential accommodation on the site will contribute to the long-term aspiration to deliver a 30-minute city where residents can access their metropolitan centre (Parramatta CBD) within 30 minutes by public transport. The site is within walking distance of Parramatta train station and the Harris Street station of the Parramatta Light Rail network between Westmead and Carlingford via Parramatta.</p>
<p>Future Transport Strategy 2056</p>	<p>The Future Transport 2056 Strategy was released by the GSC in March 2018 and provides a 40-year strategy and vision for the Greater Sydney mass transit network.</p> <p>The development of the Central River City will require improved 30-minute public transport access to Greater Parramatta. To support this, the focus will be on new city-shaping connections, particularly from the north and south. New transport connections for Greater Parramatta, including light rail, will support local access and urban renewal, with improved mass transit connectivity via Sydney Metro West.</p> <p>A number of committed (0-10 years), investigation (0-20 years) and visionary (20 + years) initiatives and investigations are identified as being planned for the Central City District. The initiatives which will increase the service frequencies include:</p> <ul style="list-style-type: none"> ▪ Parramatta Light Rail Stage 1 – Stage 1 is expected to open in 2023 – The first stage of Parramatta Light Rail will connect Westmead to Carlingford via Parramatta CBD and Camellia. ▪ Parramatta Light Rail Stage 2 – Not commenced – The second stage of Parramatta Light Rail will connect to Stage 1 and run north of the Parramatta River through the rapidly development suburbs of Ermington, Melrose Park and Wentworth Point to Sydney Olympic Park ▪ Parramatta inner ring road (improvements to existing surface road) – Upgrade of existing surface roads on the outskirts of Greater Parramatta's centre to function as arterial movement corridors. This includes surface treatments, minor interventions, and some potential widening to improve the prioritisation of vehicles. ▪ Sydney Metro Northwest – opened in May 2019 – Sydney Metro Northwest is the first stage of Sydney Metro, delivering a high-frequency, high-capacity rail service between the growth areas in the Northwest and Chatswood with interchanges to the North Shore and Northern train lines. ▪ Sydney Metro West – Construction started in late 2020 at The Bays Precinct to prepare the site for major tunnelling – Sydney Metro West is a new underground metro railway proposed to link the Parramatta and Sydney CBDs. Key precincts already identified to be serviced by Sydney Metro West include Parramatta, Sydney Olympic Park, The Bays Precinct, and the Sydney CBD. <p>The site, located on the north-east fringe of the Parramatta CBD, is well placed to leverage from the future transport network and projected infrastructure upgrades which will increase both the frequency of transport services for all forms of mobility.</p>

Q4. Will the Planning Proposal give effect to a council's endorsed local strategic planning statement, or another endorsed local strategy or strategic plan?

Yes. The Planning Proposal will give effect to and is consistent with the following endorsed strategic plans:

- Parramatta Local Strategic Planning Statement (as detailed in **Table 10**);
- Parramatta CBD Planning Strategy (as detailed in **Table 10**); and
- Parramatta Housing Strategy (as detailed in **Table 10**).

Q5. Is the planning proposal consistent with applicable State Environmental Planning Policies?

Yes. The Planning Proposal is consistent with relevant State Environmental Planning Policy (SEPP), as demonstrated in **Table 13** below.

Table 13 Consistency with SEPPs

SEPP	Consistency
State Environmental Planning Policy No 55 – Remediation of Land	SEPP 55 sets out the statutory planning framework to manage and assess contaminated land. It requires a consent authority to consider whether land is contaminated prior to granting development consent. Contamination has been addressed as part of the original DA and the site was deemed appropriate for the proposed land uses. The proposed change of use of serviced apartments will not impact this conclusion.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	The Planning Proposal does not contain provisions that would contradict or hinder the application of the Exempt and Complying SEPP.
State Environmental Planning Policy (Infrastructure) 2007	The Infrastructure SEPP provides a consistent planning regime for the provision of infrastructure and services and prescribes requirements for consultation with relevant public authorities during the assessment process. The provisions of the SEPP may be applicable to any infrastructure works associated with future development.
State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017	The Vegetation SEPP seeks to protect the biodiversity values of trees and vegetation in non-rural areas (including Parramatta) and amenity of non-rural areas of through preservation of trees and other vegetation. The provisions of the Vegetation SEPP is unlikely to be relevant in consideration of this proposal
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	Detailed compliance with the BASIX SEPP mandated levels of energy and water efficiency requirements will be demonstrated as part of a future development application relating to the proposed change of use to residential apartments.
State Environmental Planning Policy (Housing) 2021	The proposal does not rely upon the provisions of the Housing SEPP.
State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development	A future development application for the proposed change of use will include a detailed compliance assessment against SEPP 65 and the Apartment Design Guide (ADG). Notwithstanding, it must be noted that the serviced apartments proposed to be converted to residential apartments have been designed to comply with the relevant principles and design criteria of the ADG.
State Environmental Planning Policy No 64 – Advertising and Signage	Detailed compliance with SEPP 64 will be assessed as part of future development applications (as relevant to signage and advertising).

Q6. Is the Planning Proposal consistent with applicable Ministerial Directions (Section 9.1 Directions)?

Yes. The Planning Proposal has been assessed against the applicable Section 9.1 Ministerial Directions (issued on 5 August 2021) and is consistent with each of the relevant matters, as outlined in **Table 14**.

Table 14 Assessment against Section 9.1 Directions

Direction	Consistency
1.1 Business and Industrial Zones	<p>The Planning Proposal does not seek to change the existing B4 Mixed Use zone. It seeks only to amend a site-specific clause under the LEP to reduce the minimum FSR for defined non-residential land uses and enable the conversion of serviced apartments to residential apartments.</p> <p>Development on the site will continue to support the mixed use character of the area and the commercial core, through the activation of street frontages and public domain with retail uses and increasing the residential population, thereby delivering homes close to employment.</p> <p>The proposal delivers an urgent site-specific response to the social and economic consequences of Covid-19 which has had a significant impact on the long-term commercial viability of short-term accommodation on the site (specifically serviced apartments).</p> <p>The proposal will retain 3,492 sqm of commercial floor space on the site (including retail, food and beverage, a childcare centre, and a supermarket). It is forecast that these uses will 133 direct on-site jobs, 28 indirect jobs through flow-on economic multiplier effects, and around \$15 million gross value add to the local economy each year.</p>
1.2 Rural Zones	Not applicable
1.3 Mining, Petroleum Production and Extractive Industries	Not applicable
1.4 Oyster Aquaculture	Not applicable
2.1 Environment Protection Zones	Not applicable
2.2 Coastal Management	Not applicable
2.3 Heritage Conservation	Not applicable
2.4 Recreation Vehicle Areas	Not applicable
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	Not applicable
2.6 Remediation of Contaminated Land	Land contamination was addressed as part of the original development application, and the site was assessed as suitable for the proposed

Direction	Consistency
	land uses. The proposed amendment to the site-specific LEP clause will not change the assessment of contamination or remediation.
3.1 Residential Zones	Not applicable
3.2 Caravan Parks and Manufactured Home Estates	Not applicable
3.3 Home Occupations	Revoked
3.4 Integrating Land Use and Transport	The Planning Proposal is consistent with this direction. It will provide new housing supply with access to local infrastructure to create liveable, walkable, and cycle-friendly neighbourhoods. The site has direct, safe, and universally designed pedestrian and cycling connections to shops, services, and public transport. New housing will optimise and leverage from the site's proximity to existing and future public transport and infrastructure.
3.5 Development Near Regulated Airports and Defence Airfields	Not applicable
3.6 Shooting Ranges	Not applicable
3.7 Reduction in non-hosted short term rental accommodation period	Not applicable
4.1 Acid Sulfate Soils	The site is classified as Class 4 Acid Sulphate Soils. The original DA for the mixed use development was assessed against the acid sulfate soils provisions in the LEP. The consent authority determined that suitable investigations had been provided to demonstrate that the site is suitable for the development in terms of acid sulphate soils. The proposal will not affect the original assessment of acid sulphate soils.
4.2 Mine Subsidence and Unstable Land	Not applicable
4.3 Flooding	Not applicable
4.4 Planning for Bushfire Protection	Not applicable
5.1 Implementation of Regional Strategies	Revoked
5.2 Sydney Drinking Water Catchments	Not applicable
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	Not applicable
5.4 Commercial and Retail Development along the Pacific Highway (Cessnock LGA)	Revoked

Direction	Consistency
5.6 Sydney to Canberra Corridor	Revoked
5.7 Central Coast	Revoked
5.8 Second Sydney Airport: Badgerys Creek	Revoked
5.9 North West Rail Link Corridor Strategy	Not applicable
5.10 Implementation of Regional Plans	<p>The Planning Proposal is consistent with this Direction, as discussed in response to Q3 (refer to Table 12). It gives effect to the objectives of the following regional and district plans:</p> <ul style="list-style-type: none"> Greater Sydney Region Plan – A Metropolis of Three Cities; Central City District Plan; and Future Transport Strategy 2056.
5.11 Development of Aboriginal Land Council land	Not applicable
6.1 Approval and Referral Requirements	This is an administrative requirement for Council.
6.2 Reserving Land for Public Purposes	This is an administrative requirement for Council.
6.3 Site Specific Provisions	<p>The objective of this direction is to "<i>discourage unnecessarily restrictive site specific planning controls</i>".</p> <p>This Planning Proposal amends a site-specific clause of the LEP that applies a minimum 1:1 FSR for defined non-residential land use. The Clause was drafted and gazetted some four years ago in the context of the prevailing economic climate at the time. The provisions of the Clause have been rendered unfit-for-purpose as a consequence of the significant economic impacts of Covid-19 on short term accommodation industry. The LEP provision is unnecessarily restrictive in that it prevents the conversion of the serviced apartment floor space at Levels 03-12 to an alternative economically viable land use. The proposal does not derogate the intent and function of Clause 7.12 insofar as it retains some 3,492 sqm of employment-generating uses. The proposal is unique to the subject site insofar as it relates to a site-specific clause.</p>
7.1 Implementation of A Plan for Growing Sydney	Revoked. A <i>Plan for Growing Sydney</i> is now superseded. The Planning Proposal gives effect to the planning principles, directions, and priorities for strategic centres of the Greater Sydney Region Plan and the Central City District Plan (refer Table 12).
7.2 Implementation of Greater Macarthur Land Release Investigation	Revoked

Direction	Consistency
7.3 Parramatta Road Corridor Urban Transformation Strategy	Not applicable
7.4 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	Not applicable
7.5 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	To the extent relevant, the Planning Proposal is consistent with the Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan (dated July 2017).
7.6 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	Not applicable
7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor	Not applicable
7.8 Implementation of the Western Sydney Aerotropolis Plan	Not applicable
7.9 Implementation of Bayside West Precincts 2036 Plan	Not applicable
7.10 Implementation of Planning Principles for the Cooks Cove Precinct	Not applicable
7.11 Implementation of St Leonards and Crows Nest 2036 Plan	Not applicable
7.12 Implementation of Greater Macarthur 2040	Not applicable
7.13 Implementation of the Pyrmont Peninsula Place Strategy	Not applicable

9.3. ENVIRONMENTAL, SOCIAL, AND ECONOMIC IMPACTS

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The assessment of the original application for the new mixed use development on the site determined that there were no known critical habitats, threatened species, or ecological communities located on the site. Therefore the likelihood of any negative impacts as a consequence of the Planning Proposal is negligible.

Q8. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

The following section assesses the environmental impacts of the Planning Proposal.

9.3.1. Land Use

The Planning Proposal seeks to amend a site-specific provision of the LEP to enable the conversion of 4,801 sqm at Levels 03-12 from 60 'serviced apartments' to 'residential accommodation'. There are no other land use changes to the approved development (as modified). The resultant land use mix of the development is:

Table 15 GFA Comparison

Land Use	Approved GFA	Proposed GFA	Difference
Residential	83,170 sqm	87,971 sqm	+ 4,801 sqm
Serviced apartments	4,801 sqm	-	- 4,801 sqm
Retail / commercial	2,894 sqm	2,894 sqm	-
Child care	598 sqm	598 sqm	-
Total	91,463 sqm	91,463 sqm	-

[Note. The GFA and FSR calculations in Table 15 assume the determination and approval of DA/789/2021 for the conversion of 122 serviced apartments to residential apartments at Levels 13-30]

The proposal will not fundamentally change the 'nature' or 'use' of the floor space at Levels 03-12; the levels will continue to function as self-contained accommodation for occupants. The principle point of difference is that the apartments will no longer be subject to a perceived restriction on the period of occupation and will not be regularly serviced or cleaned by the owner or manager of the building on a commercial basis.

9.3.2. Built Form

The physical construction, internal fit-out, and service connections for the purpose of serviced apartments at Levels 03-12 is now complete, in accordance with the original consent to DA/480/2018 (as modified). The serviced apartments are capable of immediate occupancy for the purpose of 'residential accommodation'. There is no change required to the internal layout, floor plate configuration, ceiling heights, or private open spaces of the serviced apartments (as constructed) to facilitate their conversion to residential apartments.

The conversion of the constructed 60 serviced apartments to residential apartments would not involve nor necessitate any internal modifications or physical changes to the built form, massing, density, or external appearance of the approved mixed use development (as modified), in relation to building height, gross floor area, building setbacks, building separation, public domain, signage, or external façade appearance.

9.3.3. Residential Apartment Amenity

The MSA suites at Levels 03-12 were approved and constructed to achieve a high level of compliance with the design quality principles of SEPP 65 and design criteria of the Apartment Design Guide, specifically with regards to solar access, natural ventilation, internal areas, private open space, safety and security, minimum internal and external amenity, storage, floor-to-ceiling heights, and sustainability. The Design Verification

Statement for the DA is equally applicable to Levels 03-12. Therefore these levels are compliant with the applicable objectives and design criteria as outlined in **Table 16** below and will be addressed in a future DA.

Table 16 demonstrates the compliance of the additional 60 residential apartments at Levels 03-12 with the key principles of SEPP 65 and design criteria of the Apartment Design Guide. [**Note.** The assessment is against the entire residential component of the development, including Levels 03-12 where relevant.]

Table 16 ADG Compliance Assessment

ADG Objective and Design Criteria	Proposed Residential Apartments	Compliance
Objective 4A-1 Solar Access <i>To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space.</i>	78% of apartments and private open spaces receive 2 hours direct sunlight in mid-winter.	Yes
Objective 4B-3 Natural Cross Ventilation <i>The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents.</i>	84% of apartments have natural cross ventilation in the first 9 storeys. Apartment depths are limited to 8 metres for open plan layout to maximise airflow.	Yes
Objective 4C-1 Floor to Ceiling Heights <i>Ceiling height achieves sufficient natural ventilation and daylight access.</i>	The minimum ceiling heights proposed are: <ul style="list-style-type: none"> 2.7 metres for habitable rooms; and 2.4 metres for non-habitable rooms. 	Yes
Objective 4D-1 Minimum Apartment Sizes <i>The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity.</i>	The proposed apartments will comply with the ADG minimum apartment sizes: <ul style="list-style-type: none"> Studio apartments: between 39 – 44 sqm 1-bedroom apartments: between 50 – 52 sqm 2-bedroom apartments: between 80 – 88 sqm 	Yes
Objective 4D-3 Minimum Room Sizes <i>Apartment layouts are designed to accommodate a variety of household activities and needs.</i>	The residential apartments are consistent with ADG requirements for the minimum size of rooms.	Yes
Objective 4E-1 Private Open Space <i>Apartment provide appropriately sized private open space and balconies to enhance residential amenity.</i>	The proposed residential apartments have primary balconies that satisfy the minimum private open space requirements of the ADG.	Yes
Objective 4F-1 Core/Circulation <i>Common circulation spaces achieve good amenity and properly service the number of apartments.</i>	The design and configuration of Levels 03-12 is consistent with ADG requirements regarding common circulation spaces.	Yes
Objective 4G-1 Storage		Yes

ADG Objective and Design Criteria	Proposed Residential Apartments	Compliance
<i>Adequate, well designed storage is provided in each apartment.</i>	The residential apartments provide storage spaces consistent with ADG storage provisions.	

9.3.4. Natural Environmental Impacts

The proposal does not involve any physical changes to the built form of the original approved development.

The site is highly urbanised, having had an established history of use for commercial and residential land uses. Furthermore, the site is free of significant natural environmental constraints. Accordingly, the proposal will not have any resultant impacts on the natural environment beyond those assessed and considered acceptable in the original development, in relation to sustainability, acid sulfate soils, land contamination, flood planning, flora and fauna, wind, biodiversity, water protection, or heritage (including archaeological).

No threatened species or endangered flora or fauna will be affected by the proposed conversion of Levels 03-12 to residential apartments and there will be no environmental impacts on biodiversity.

9.3.5. Amenity Impacts

The proposal is entirely compatible with the existing and emerging context of the site and will not result in any amenity impacts to surrounding land uses beyond those originally approved, in relation to wind, noise, air quality, overshadowing, odour, privacy, overlooking, view loss, or solar access.

9.3.6. BCA Compliance

A future DA will be supported by a BCA Assessment to assess the capability of the residential apartments to achieve compliance with the Building Code of Australia (BCA) and relevant Australian standards.

9.3.7. Accessibility

The serviced apartments are designed to allow ease of access for all occupants and staff through the provision of continuous paths of travel, circulation spaces and appropriate gradients. Notwithstanding, a future DA will be supported by an access statement to assess compliance with relevant statutory guidelines, including the BCA, The DDA Access To Premises Standard, AS1428 suite of Standards, AS2890.6 (for car parking), AS1735.12 (for lifts), AS4299 (Adaptable Housing), SEPP 65 (Part 4Q), and Council's DCP. Access will be assessed in terms of ingress and egress, paths of travel, lifts, stairs, circulation areas, stairways, steps/kerb ramps, walkways, accommodation, parking areas, ground surfaces, and staff facilities.

9.3.8. Traffic and Parking

The proposal does not necessitate any changes to the car parking provision allocated to the 60 MSA suites. The car parking spaces allocated to the MSA suites will be re-allocated to the new residential apartments.

The change of use from serviced apartments to residential apartments is not considered to result in a more intensive use and therefore the proposal will have acceptable traffic and parking impacts.

9.3.9. Construction or Vibration Impacts

The physical construction, internal fit-out, and service connections for the purpose of serviced apartments at Levels 03-12 is now complete, in accordance with the original consent to DA/480/2018 (as modified). There are no additional construction works required to facilitate the conversion of serviced apartments to residential apartments. Therefore, there will be no additional construction activity or associated amenity impacts (such as noise, air pollution, vibration, or construction traffic) as a consequence of the proposal.

Q9. Has the Planning Proposal adequately addressed any social and economic effects?

Yes. The Planning Proposal will deliver a range of social and economic benefits as summarised below.

Social Impacts

The proposal will deliver diverse social benefits. These can be summarised as follow.

- The provision of 60 additional residential apartments aligns with State strategic policy to deliver 14,000 new dwellings within the Parramatta CBD over the next 40 years and create a dynamic and diverse city.
- The proposal will contribute a range of residential typologies (studios, one-bedrooms, and two-bedroom units) and diversify the supply of housing for residents and families in the Parramatta CBD.
- Future residents will benefit from the site's strategic location on the fringe of the Parramatta CBD and its immediate (walking) proximity to significant employment opportunities, convenience retail, employment opportunities, community amenities, health services, and major transport infrastructure.
- Future residential occupants will contribute activation and social vibrancy throughout the podium levels and pedestrian public domain around Charles Street and George Street. An increased residential population will contribute net economic benefits to the wider CBD and night-time economy.

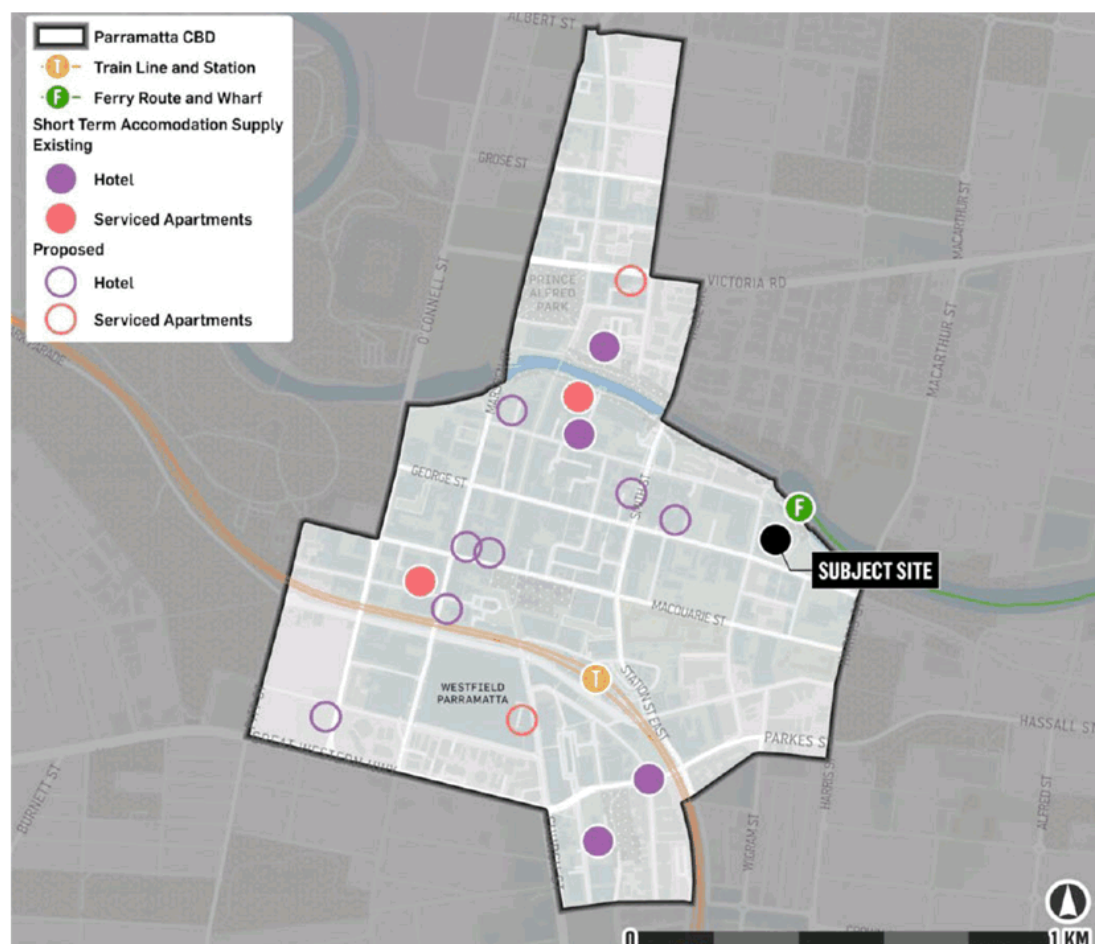
Economic Impacts

This Planning Proposal is accompanied by a Strategic Positioning Paper prepared by Urbis (**Appendix A**) to outline the economic necessity of the proposal and identify the substantial economic impacts on the immediate and broader community. The economic impacts of the proposal can be summarised as follows.

- **Impacts of Covid-19 on the short stay accommodation industry.** The impacts of Covid-19 on the short term accommodation are evident through the dramatic drop in occupancy experienced across Meriton's serviced apartment portfolio. In the year prior to Covid-19 the MSA national portfolio performed strongly with an average occupancy of 87% for the year. High average occupancy of 88% was recorded in their NSW portfolio, including a 91% rate at their 254-room operation at 330 Church Street, Parramatta. As Covid-19 resulted in domestic and international border closures, long periods of city-wide lockdowns and working from home conditions their portfolio took a drastic hit. Throughout the first 12 months of Covid-19, from April 2020 to March 2021 Meriton's National portfolio experienced a significant 43% percentage point drop in average occupancy, which is consistent with the wider short term accommodation market. NSW recorded an overall 45% percentage point drop and Parramatta occupancy has dropped by a third to average 58%. During the second (and longest) lockdown period in Greater Sydney, from June 2021 to October 2021, Meriton Parramatta recorded its lowest occupancy at only 38%, reflecting a dramatic 53% drop from pre Covid-19 levels. This dramatic drop and average low occupancy throughout Covid-19 has had major financial impacts on Meriton.
- **Supply pipeline of hotels and serviced apartments in the CBD.** There are currently 936 hotel rooms and 346 serviced apartments within the Parramatta CBD, equating to a total of 1,282 short term accommodation units. With a proposed pipeline of 1,538 hotel rooms and 274 serviced apartments expected to be delivered by 2027, the number of short term accommodation units will grow to 3,094. This increase equates to the CBD short term accommodation supply increasing by 2.5x. As there is such a large supply pipeline, the proposed conversion of the remaining approved 60 serviced apartments into residential units at the subject site, will only result in a 3% decrease in total supply by 2027.
- **Slow recovery of the short stay sector.** Covid-19 had a major negative impact on the performance of existing short term accommodation facilities in the CBD. The average occupancy dropped from 84% in 2019 to 43% in 2021. As remote working conditions have flourished since the pandemic, aided by advances in remote working technology, it is likely businesses will embrace remote working moving forward. Therefore it is unlikely business related travel will return to pre-Covid levels. Occupancies are forecast to increase in the short term as the sector recovers from Covid 19, reaching 68% in FY23. Occupancies are then forecast to decline to 53% by 2025 due to the proposed supply pipeline far outweighing additional demand. Even as occupancy in the CBD pick up beyond 2025 and new supply starts to be absorbed by additional demand, occupancies are expected to stay well below the sustainable occupancy rate of 75% until at least 2030 and will take even longer to return to the pre-Covid average occupancy rate of 84%.

- **Weak competitive positioning of the site for serviced apartments.** Many existing and proposed high quality short term accommodation facilities in the CBD are better placed than the subject site to attract future visitors (refer **Figure 7**). The site is located on the eastern periphery of the CBD away from the commercial core when compared to other similar high quality and large short-term accommodation facilities (rated at least 4 stars). Other facilities are better placed as they have easier access to offices, retail, and transport. Strong competitive positioning is vital given that the large supply pipeline will create intense competition among facilities, particularly as the industry recovers from Covid-19 and occupancy remains below the sustainable occupancy rate.
- High quality and large facilities with a better positioning than the site include:
 - Meriton Suites Church Street (254 rooms, 5 stars)
 - Park Royal Parramatta (286 rooms, 4.5 stars)
 - (Proposed) Hilton Parramatta (245 rooms, 5 stars)
 - (Proposed) QT Hotel (250 rooms, 5 stars)
 - (Proposed) Intercontinental Hotel (200 rooms, 5 stars)

Figure 7 Existing and Proposed Short-Term Accommodation in the CBD



Source: Urbis

- **Minimal loss of jobs and economic contribution to the local economy.** The site provides some 3,492 sqm of employment-generating uses (including retail, food and beverage, a childcare centre, and a supermarket). Based on industry standard job density benchmarks, the ongoing operations of these uses will support 133 jobs, resulting in only a 4% reduction in jobs supported if the serviced apartments are converted. As Meriton had planned to service the site as a satellite operation to the Church Street operation, the potential loss of jobs could be even less than 4%. In addition to the 133 direct on-site jobs, the ongoing operation of the other uses is forecast to support a further 28 indirect jobs through flow-on economic multiplier effects. The continued operations will deliver around \$15 million gross value add to the local economy each year. Around 400 - 500 jobs will continue to be generated by the development during the construction period. With residential apartments requiring the same high level of design as serviced apartments, the construction cost will remain largely unchanged. In effect, the supported jobs and economic contribution to the local economy will remain the same as originally approved.
- **Generation of an additional \$2.2 million in retail spending annually.** There is expected to be a considerable oversupply of 962 short term accommodation units in 2030. This oversupply indicates there will be no loss of tourists within the CBD, as they will be easily catered for by other high quality developments. The additional 60 residential units also have the potential to support around 160 additional residents within the CBD. These residents will bring in additional \$2.2 million of annual retail spending that will benefit existing and new businesses. This additional spending will far outweigh the potential economic loss to the local economy from losing five ongoing jobs. and no change to tourists spending.
- **Inability to convert serviced apartments to an alternative employment generating use.** Meriton commenced construction of the project in late 2020. The majority of levels have been constructed, including the physical construction and internal fit-out of Levels 03-12 for the approved serviced apartments use. However, the floor plate configuration, floor-to-ceiling heights, and location of structural columns do not facilitate the practical conversion or adaptation of these levels to any alternative employment-generating land use, such as commercial offices. Therefore the only economically feasible alternative land use for the MSA suites at Levels 03-12 is residential accommodation.

9.4. STATE AND COMMONWEALTH INTERESTS

Q10. Is there adequate public infrastructure for the planning proposal?

Yes. The impacts of the development on public infrastructure was assessed in the original development.

The approved building is serviced by utility services and connections and will allow future workers, visitors, and residents to utilise existing and planned infrastructure and services within the area.

Q11. What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?

This Planning Proposal is in a preliminary stage and no consultation with State or Commonwealth authorities has been undertaken to date. It is understood that the City of Parramatta Council will undertake the required consultation with relevant state and Commonwealth public authorities following the Gateway determination.

10. PART 4 – MAPPING

The Planning Proposal does not necessitate any amendment to the LEP maps applicable to the site.

11. PART 5 – COMMUNITY CONSULTATION

Division 3.4 of the EP&A Act requires the relevant planning authority to consult with the community and relevant State or Commonwealth public authorities in accordance with the gateway determination. It is anticipated that the Planning Proposal will be publicly exhibited for at least 28 days in accordance with 'A Guide to Preparing Local Environmental Plans' (DPIE).

At a minimum, the notification of the public exhibition of the Planning Proposal is expected to involve:

- A public notice in local newspaper(s).
- A notice on the City of Parramatta Council website.
- Written correspondence to adjoining and surrounding landowners.

As part of the public consultation process, the Proponent (Meriton) will review all submissions, consult with Council and DPIE, and provide a written response to assist in the assessment of the Planning Proposal.

12. PART 6 – PROJECT TIMELINE

It is anticipated that the LEP amendment will be completed within 12 months.

The following table sets out the anticipated project timeline in accordance with the DPIE guidelines. The key milestones and overall timeframe will be subject to further detailed discussions with Council and the DPIE.

Table 17 Indicative Project Timeline

Stage	Timeframe and/or Date
Planning Proposal submitted to City of Parramatta Council	December 2021
Preliminary review and assessment of Planning Proposal	March 2022
Local Planning Panel recommend the Planning Proposal be submitted to DPIE for Gateway Determination	March 2022
Planning Proposal referred to DPIE for Gateway Determination	April 2022
DPIE issue Gateway Determination	June 2022
Proponent response to matters in Gateway Determination	June – July 2022
Public exhibition and agency consultation	July 2022
Post exhibition review of submissions	August – September 2022
Council endorsement of Planning Proposal	October 2022
Submission to DPIE for finalisation	October 2022
Legal drafting of amendment to LEP	November 2022
Gazettal of amendment to LEP	December 2022

13. CONCLUSION

The intended outcome of this Planning Proposal is to amend a site-specific provision of the Parramatta Local Environmental Plan 2011 that applies to 180 George Street, Parramatta.

The Planning Proposal seeks to amend a site-specific provision to reduce the minimum FSR for defined non-residential uses and enable an alternative land use to the serviced apartments at Levels 03-12 of the site, which would otherwise remain unoccupied and prevent orderly, economic, and efficient use of land. The Planning Proposal does not seek any change to the existing B4 Mixed Use zoning of the site, the applicable height of building or FSR development standards, or any other LEP controls or provisions.

The Planning Proposal is justifiable from a strategic merits perspective for the following reasons:

- It delivers an urgent, site-specific response to the social and economic consequences of Covid-19 which has resulted in significant change to conventional business practices, hospitality, and tourism travel.
- It facilitates an appropriate placed-based outcome and supports the future economic viability of the site.
- It has potential to support some 160 new residents and contribute an additional \$2.2 million of annual retail spending that will benefit existing and future businesses. This additional spending will far outweigh the potential economic loss to the local economy from the conversion of the serviced apartments.
- It aligns with the State Government target to provide 14,000 new dwellings within the Parramatta CBD over the next 40 years and the 20-year strategic target for the Central City for 207,500 new dwellings.
- It delivers a mix of housing typologies to satisfy the demand for choice and diversity in the housing market in the CBD and respond to changing demographic characteristics.
- It responds to State Government's strategic vision to create '30-minute' cities where residents can access their metropolitan centre within 30 minutes by public transport.
- It represents an entirely logical and appropriate location for additional residential accommodation given its strategic location close to the CBD and its immediate (walking) proximity to convenience retail, employment opportunities, community health and education facilities, and public transport.

The Planning Proposal is justifiable from a site-specific merits perspective for the following reasons:

- It amends a site-specific provision that was gazetted in April 2018 in the context of the prevailing economic climate at the time and conceived as part of the Parramatta CBD Strategy over a decade ago.
- It does not derogate the intent and function of Clause 7.12 insofar as it retains some 3,492 sqm of defined non-residential land uses (being 'commercial premises' and 'centre-based child care facilities').
- It relates to floor plates at Levels 03-12 which have been physical constructed and internally fit-out for the purpose of serviced apartments. There is no change required to the internal layout, ceiling heights, floor plate configuration, or private open spaces to facilitate their conversion to residential apartments.
- It will not fundamentally change the 'nature' or 'use' of Levels 03-12; the levels will continue to function as self-contained accommodation. The only difference is that the apartments will no longer be subject to any restriction on the period of occupation and not be serviced or cleaned on a commercial basis.
- The apartments achieve a high level of compliance with SEPP 65 and the ADG, specifically with regards to solar access, natural ventilation, minimum internal areas, private open space, safety and security, minimum internal and external amenity, storage, floor-to-ceiling heights, and sustainability.
- It will not necessitate any physical changes to the approved built form or appearance, in relation to building height, gross floor area, setbacks, building separation, the public domain, or façade design.
- It will not have any impacts on the natural environment, in relation to sustainability, acid sulfate soils, land contamination, flood planning, flora and fauna, wind, biodiversity, water protection, or heritage.
- It does not necessitate any changes to the approved vehicle access arrangements or car parking.

Aligned with the strategic and site-specific merits, the Planning Proposal is entirely justified as it promotes orderly, economic, and efficient use of land which would otherwise remain unoccupied and underutilised.

This Planning Proposal to amend the Parramatta Local Environmental Plan 2011 has been prepared in accordance with the relevant provisions of the Environmental Planning & Assessment Act 1979, the regulations, applicable Local Planning Directions, and guidelines for the preparation of LEP amendments.

Accordingly it is recommended that Council resolves to support this site-specific Planning Proposal and forward the amended LEP to the NSW Department of Planning, Industry, and Environment for Gateway Determination in accordance with Section 3.33 of the Environmental Planning and Assessment Act 1979

DISCLAIMER

This report is dated 30 November 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of MERITON GROUP (**Instructing Party**) for the purpose of Draft (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.



URBIS.COM.AU



Political donations and gifts disclosure statement

Office use only:

Date received: ___/___/___

Planning Application No: _____

This form may be used to make a political donations and gifts disclosure under section 147(4) and (5) of the *Environmental Planning Assessment Act 1979* for applications or public submissions to a council.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the "Glossary of terms" provided overleaf (for definitions of terms in *italics* below).

Once completed, please attach the completed declaration to your planning application or submission.

Explanatory information

Making a planning application to a council

Under section 147(4) of the Environmental Planning and Assessment Act 1979 ("the Act") a person who makes a *relevant planning application* to a council is required to disclose the following *reportable political donations and gifts* (if any) made by any *person with a financial interest* in the application within the period commencing 2 years before the application is made and ending when the application is determined:

- (a) all reportable political donations made to any local councillor of that council
- (b) all gifts made to any local councillor or employee of that council.

Making a public submission to a council

Under section 147(5) of the Act a person who makes a *relevant public submission* to a council in relation to a relevant planning application made to the council is required to disclose the following reportable political donations and gifts (if any) made by the person making the submission or any *associate of that person* within the period commencing 2 years before the submission is made and ending when the application is determined:

- (a) all reportable political donations made to any local councillor of that council
- (b) all gifts made to any local councillor or employee of that council.

A reference in sections 147(4) and 147(5) of the Act to a reportable political donation made to a "local councillor" includes a reference to a donation made at the time the person was a candidate for election to the council.

How and when do you make a disclosure?

The disclosure of a reportable political donation or gift under section 147 of the Act to be made:

- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation or gift is made before the application or submission is made; or
- (b) if the donation or gift is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation or gift is made.

City of Parramatta Council ABN 49 907 174 773
126 Church Street, Parramatta PO Box 32, Parramatta NSW 2124
P 02 9806 5050 F 02 9806 5917 www.cityofparramatta.nsw.gov.au

(Continued)

What information needs to be in a disclosure?

The information requirements of the disclosure are outlined in the Act under section 147(9) for political donations and section 147(10) for gifts.

Pages 5 and 6 of this document include a Disclosure Statement Template which outlines the relevant information requirements for disclosures to a council.

Note: A separate Disclosure Statement Template is available for disclosures to Minister or the Director-General of the Department of Planning.

Warning: A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147. The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part. Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

gift means a gift within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981*. Note. A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of the *Election Funding and Disclosures Act 1981* gift is defined as follows:

gift means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

local councillor means a councillor (including the mayor) of the council of a local government area.

relevant planning application means:

- (a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site; or
- (b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
- (c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
- (d) an application for development consent under Part 4 (or for the modification of a development consent), or
- (e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application,

but does not include:

- (f) an application for (or for the modification of) a complying development certificate, or
- (g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
- (h) any other application or request that is excluded from this definition by the regulations.

relevant period is the period commencing 2 years before the application or submission is made and ending when the application is determined.

relevant public submission means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

reportable political donation means a reportable political donation within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981* that is required to be disclosed under that Part. Note. Reportable political donations include those of or above \$1,000.

Note: Under section 86 of the *Election Funding and Disclosures Act 1981* reportable political donation is defined as follows:

86 Meaning of "reportable political donation"

- (1) For the purpose of this Act, a reportable political donation is:
 - (a) in the case of disclosures under this Part by a party, elected member, group or candidate – a political donation of or exceeding \$1,000 made to or for the benefit of the party, elected member, group or candidate, or
 - (b) in the case of disclosures under this Part by a major political donor – a political donation of or exceeding \$1,000:
 - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
 - (ii) made to the major political donor
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person with the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
- (4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

Glossary of terms (continued)

a person has a financial interest in a relevant planning application if:

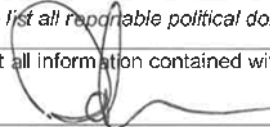
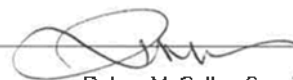
- (a) the person is the applicant or the person on whose behalf the application is made, or
- (b) the person is an owner of the site to which application relates or has entered into an agreement to acquire the site or any part of it, or
- (c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- (d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations

Persons are associated with each other if:

- (a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
- (b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
- (c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- (d) they have any other relationship prescribed by the regulations.

Political Donations and Gifts Disclosure Statement to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see Page 1 for details), please fill in this form and sign below.

Disclosure Statement Details					
Name of person making this disclosure statement Karimbla Properties (No. 13) Pty Ltd ABN 87 115 506 502			Planning application reference (e.g. DA number, planning application title or reference, property address or other description) Lot 302 DP 1250440 - 180 George Street, Parramatta		
Person's interest in the application (circle relevant option below)					
You are the APPLICANT YES / NO OR You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION YES / NO					
Reportable political donations or gifts made by person making this declaration or by other relevant persons					
<p>* State below any reportable political donations or gifts you have made over the 'relevant period' (see glossary on page 2). If the donation or gift was made by entity (and not by you as an individual) include Australian Business Number (ABN).</p> <p>* If you are the applicant of a planning application state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</p> <p>* If you are a person making a submission in relation to an application, state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by associate.</p>					
Donation or gift?	Name of donor (or ABN if an entity); or name of person who made the gift	Donor's residential address or entity's registered address or other official office of the donor; address of person who made the gift or entity's address	Name of party or person for whose benefit the donation was made; or person to whom the gift was made	Date donation or gift was made	Amount/value of donation or gift
N/A	N/A	N/A	N/A	N/A	N/A
Please list all reportable political donations and gifts – additional space is provided overleaf if required.					
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.					
Signature(s) and Date 03.12.21		 			
Name(s) _____		David Cremona - Director Robyn McCully - Secretary			





OVERVIEW

Urbis has been commissioned by Meriton to prepare a report to highlight the key reasons why their proposal to convert the remaining 60 serviced apartments at 180 George Street, Parramatta (subject site) into residential apartments should be supported.

Key reasons the proposed conversion at 180 George Street should be supported include:

- 01 Covid-19 has delivered the short stay accommodation industry a significant blow.
- 02 The Parramatta CBD has a large supply pipeline of hotels and serviced apartments.
- 03 The short stay sector is expected to experience a slow recovery from Covid-19 due to the increasing future supply.
- 04 The subject site has a relatively weak competitive positioning for serviced apartments.
- 05 The conversion will lead to a minimal loss of jobs and economic contribution to the local economy.
- 06 The conversion will generate an additional \$2.2 million in retail spending annually that will support existing and new businesses.
- 07 The serviced apartments cannot be converted into another employment generating use due to building constraints.

01

COVID-19 HAS DELIVERED THE SHORT TERM ACCOMMODATION INDUSTRY A SIGNIFICANT BLOW

The impacts of Covid-19 on the short term accommodation are evident through the dramatic drop in occupancy experienced across Meriton's serviced apartment portfolio.

In the year prior to Covid-19 the Meriton Serviced Apartments national portfolio performed strongly with an average occupancy of 87% for the year.

High average occupancy of 88% was recorded in their NSW portfolio, including a 91% rate at their 254-room establishment at 330 Church Street, Parramatta.

As Covid-19 resulted in domestic and international border closures, long periods of city-wide lockdowns and working from home conditions their portfolio took a drastic hit.

Throughout the first 12 months of Covid-19, from April 2020 to March 2021 Meriton's National portfolio experienced a significant 43% percentage point drop in average occupancy, which is consistent with the wider short term accommodation market. NSW recorded an overall 45% percentage point drop and Parramatta

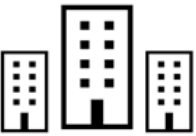


occupancy has dropped by a third to average 58%.

During the second (and longest) lockdown period in Greater Sydney, from June 2021 to October 2021, Meriton Parramatta recorded its lowest occupancy at only 38%, reflecting a dramatic 53% drop from pre Covid-19 levels. This dramatic drop and average low occupancy throughout Covid-19 has had major financial impacts on Meriton.



Meriton Parramatta occupancy
reached as low as **38%**
↓ 53 percentage point drop
from Pre Covid-19

IMPACT OF COVID-19 ON MERITON SERVICED APARTMENTS

Meriton Serviced Apartments	Pre Covid-19 Occupancy*	Covid-19 Occupancy**	Covid-19 Impact
 PARRAMATTA	91%	58%	↓ 33%
 NSW	88%	43%	↓ 45%
 NATIONAL	87%	44%	↓ 43%

Note: *indicates the Pre Covid-19 period as April 2019 to March 2020, **indicates Covid-19 Occupancy period as April 2020 to March 2021
Source: Meriton; Urbis

02 THE PARRAMATTA CBD ALREADY HAS A LARGE SUPPLY PIPELINE OF HOTELS AND SERVICED APARTMENTS

The proposed pipeline of short term accommodation facilities within the Parramatta CBD is expected to result in the existing supply increasing 2.5x by 2027.

There are currently 936 hotel rooms and 346 serviced apartments within the Parramatta CBD, equating to a total of 1,282 short term accommodation units.

With a proposed pipeline of 1,538 hotel rooms and 274 serviced apartments expected to be delivered by 2027, the number of short term accommodation units will grow to 3,094. This increase equates to the Parramatta CBD short term accommodation supply increasing by 2.5x.

As there is such a large supply pipeline, the proposed conversion of the remaining approved 60 serviced apartments into residential units at the subject site, will only result in a 3% decrease in total supply by 2027.

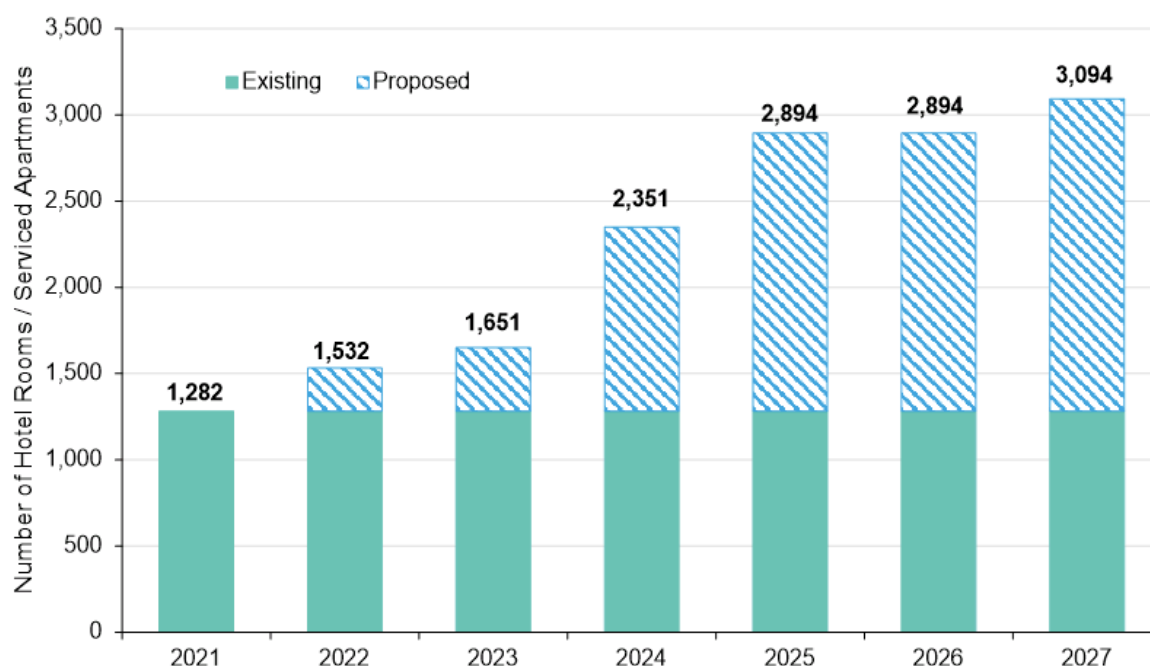
2.5x

Parramatta CBD Short Term Accommodation Supply is expected to nearly triple by 2027

↓3%

The proposed conversion will have a minimal impact on Short Term Accommodation Supply by 2027

SHORT TERM ACCOMMODATION SUPPLY



Source: Cordell; Urbis

03 THE SHORT STAY SECTOR IS EXPECTED TO EXPERIENCE A SLOW RECOVERY FROM COVID-19

The chart below shows the projected future occupancy rate of short term accommodation facilities in the Parramatta CBD.

Covid-19 had a major negative impact on the performance of existing establishments as average occupancy dropped from 84% in 2019 to 43% in 2021.

We forecast that visitation and room demand will recover in 2022 onwards as international borders reopen and domestic travel picks up. Growth will be driven by population growth, new infrastructure and commercial development within the Parramatta CBD.

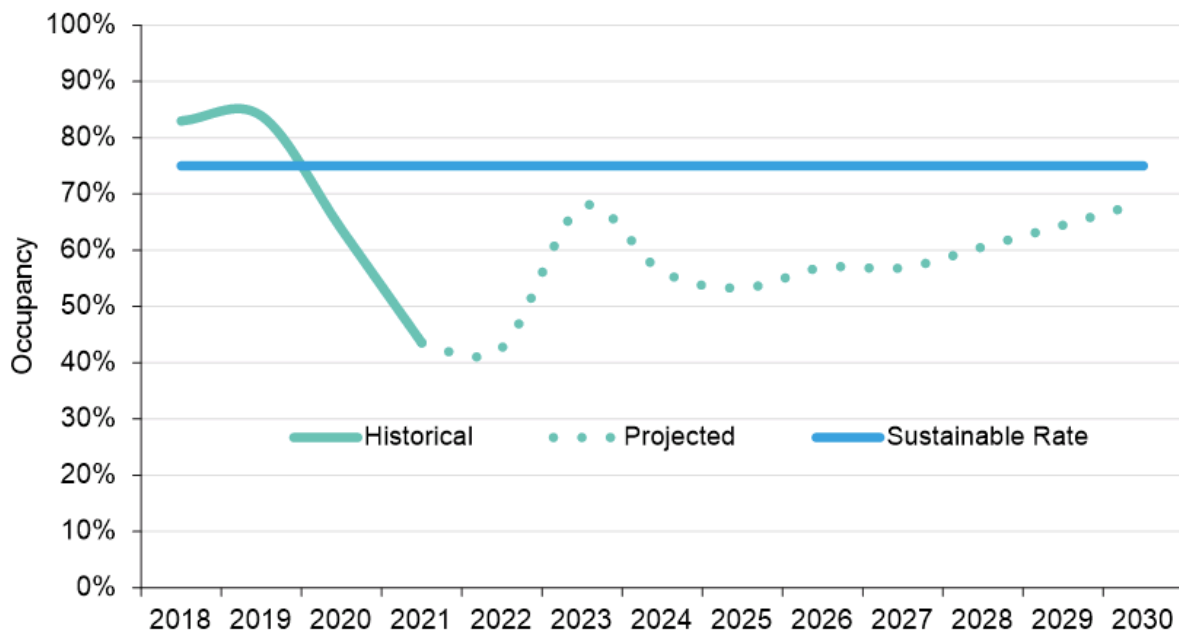
However, demand will likely be permanently impacted by Covid-19 in Parramatta CBD, as business travel accounts for a significant market share. As remote working conditions have flourished throughout Covid-19, aided by advances in remote working technology, it

is likely businesses will embrace remote working moving forward. Therefore it is unlikely business related travel will return to pre Covid-19 levels.

The chart below compares forecast demand with future supply to understand potential occupancy rates across the market. Occupancies are forecast to increase in the short term as the sector recovers from Covid-19, reaching 68% in FY23. Occupancies are then forecast to decline to 53% by 2025 due to the proposed supply pipeline far outweighing additional demand.

Even as occupancy in the Parramatta CBD starts to pick up beyond 2025 and new supply starts to be absorbed by additional demand, occupancies are expected to stay well below the sustainable occupancy rate of 75% until at least 2030 and will take even longer to return to the pre-Covid average occupancy rate of 84%.

PARRAMATTA CBD SHORT TERM ACCOMMODATION OCCUPANCY PROJECTIONS



Note: Data is as at June

Source: TRA; ABS; Cordell; Urbis

04 THE SUBJECT SITE HAS A RELATIVELY WEAK COMPETITIVE POSITIONING FOR SERVICED APARTMENTS

Many existing and proposed high quality short term accommodation facilities are better placed in the Parramatta CBD than the subject site to attract future visitors.

The map below shows that the subject site is on the eastern periphery of the Parramatta CBD and disconnected from the commercial core compared to other establishments rated at least 4 stars.

The commercial core of the CBD is the area largely bounded by Marsden Street, Smith Street, Parramatta River and the train line. Establishments within the core are better placed as they have easier access to offices, retail and transport.

As the large supply pipeline will create intense competition among facilities, particularly as the industry recovers from Covid-19 and occupancy remains below

the sustainable occupancy rate, strong competitive positioning is vital. High quality and large facilities with a better positioning than the subject site include:

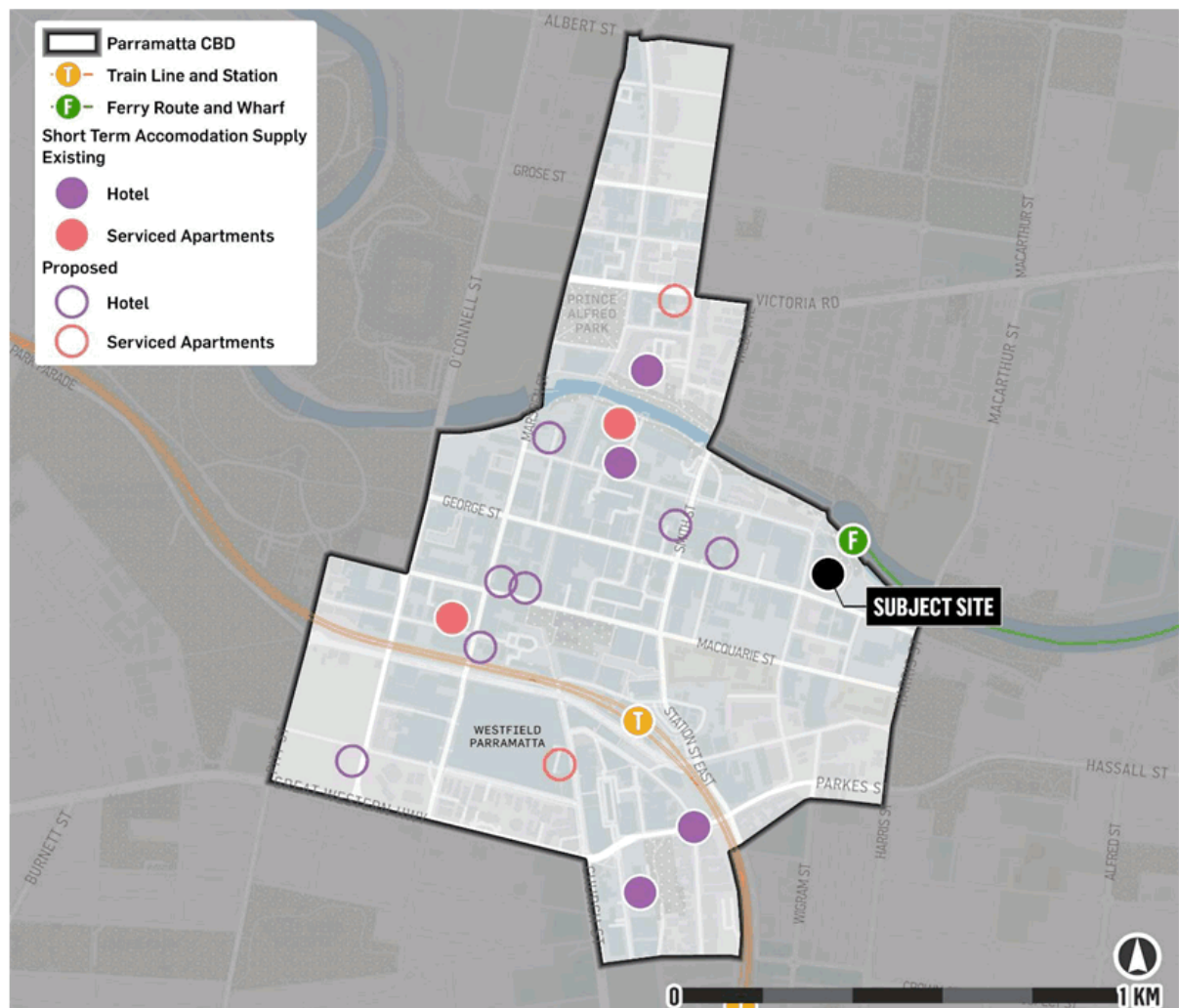
Existing

- Meriton Suites Church Street (254 rooms and 5 stars)
- Park Royal Parramatta (286 rooms and 4.5 stars)

Proposed

- Hilton Parramatta (245 rooms and 5 stars)
- QT Hotel (250 rooms and 5 stars)
- Intercontinental Hotel (200 rooms and 5 stars).

PARRAMATTA CBD SHORT TERM ACCOMMODATION CONTEXT



05 LIMITED LOSS OF JOBS AND ECONOMIC CONTRIBUTION TO THE LOCAL ECONOMY

According to benchmarks from Meriton on full-time staff per room across their service apartment portfolio, the conversion of the remaining 60 serviced apartments will only result in a loss of five full-time jobs.

Close to 3,500 sq.m of other stronger employment generating uses proposed on the site including retail, food and beverage, a childcare centre and a supermarket will still generate new employment. Based on industry standard job density benchmarks the ongoing operations of these uses will still be able to support 133 jobs, resulting in only a 4% reduction in jobs supported if the conversion were approved. As Meriton had planned to service the subject site as a satellite operation to their larger Church Street offer, the potential loss of jobs could be even less than 4%.

In addition to the 133 direct on-site jobs, the ongoing operation of the other uses still proposed is forecast to support a further 28 indirect jobs through flow-on economic multiplier effects. More so, the continued operations will deliver around \$15 million gross value add to the local economy each year.

Around 400 - 500 jobs will continue to be generated by the development during the construction period. With residential apartments requiring the same high level of design as serviced apartments, the construction cost will remain largely unchanged. In effect, the supported jobs and economic contribution to the local economy will remain the same as previously approved.

DIRECT ONGOING EMPLOYMENT

Land Use	Provision	Job Density	Ongoing Jobs
Supermarket	1,918 sq.m	25 sq.m per job	77
Retail / Food and Beverage	976 sq.m	25 sq.m per job	39
Childcare	598 sq.m	35 sq.m per job	17
Serviced Apartments proposed to be converted	60 rooms	12 sq.m per job	5
Total Approved Jobs			138 jobs
Total Jobs if Serviced Apartments are converted			133 jobs
Impact (%)			- 4%

Source: Meriton; Landcom, City of Sydney FES 2017; Urbis

+/- 0%

Construction jobs and project expenditure will remain unchanged

↓ 4%

Minimal loss of ongoing jobs supported on site



133

Direct Jobs



28

Indirect Jobs



150

Total Jobs



\$15 million GVA p.a.

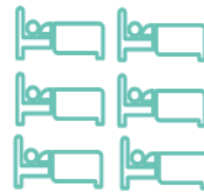
Expected contribution of the ongoing operations of the site to the local economy

06

THE CONVERSION TO RESIDENTIAL WILL GENERATE AN ADDITIONAL \$2.2 MILLION ANNUALLY IN RETAIL SPENDING THAT WILL SUPPORT EXISTING AND NEW BUSINESSES

Another consideration when converting the remaining serviced apartments to residential apartments is the potential loss of tourists and their spending in the Parramatta CBD. The chart below shows there is expected to be a considerable oversupply of 962 short term accommodation units in 2030, even as the serviced apartments are removed from the pipeline. This oversupply indicates there will be no loss of tourists within the Parramatta CBD, as they will be easily catered for by other high quality developments.

The new 60 residential units also have the potential to support around 160 new residents within the Parramatta CBD. These residents will bring in additional \$2.2 million of annual retail spending that will benefit existing and new businesses. This additional spending will far outweigh the potential economic loss to the local economy from losing five ongoing jobs, and no change to tourists spending.



+/- 0

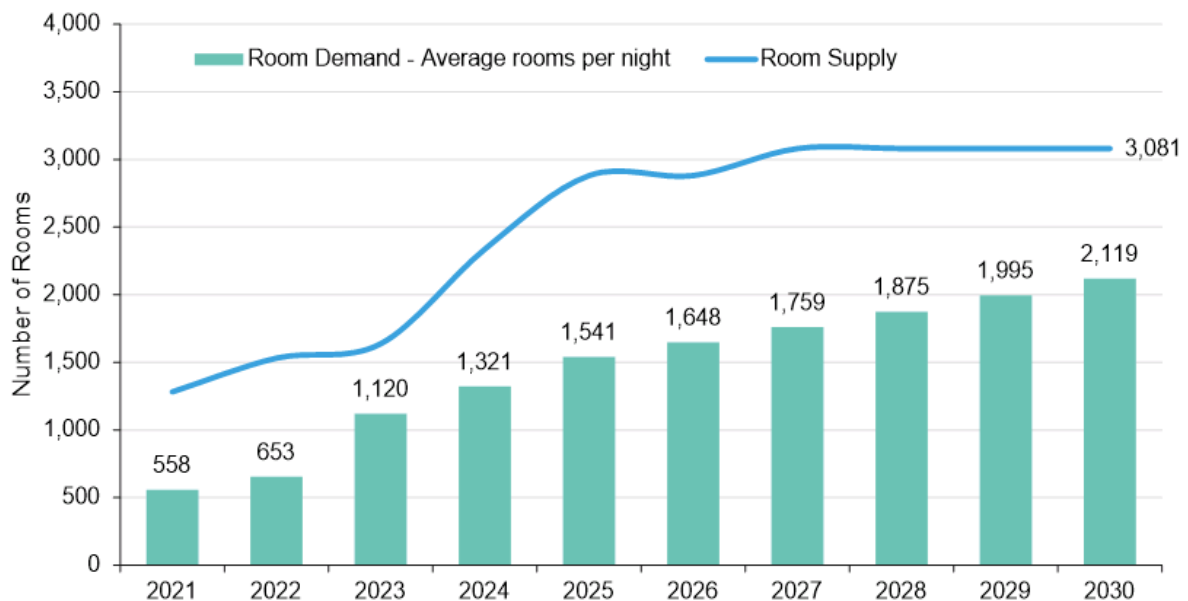
No loss of tourist as hotel supply will easily absorb demand



+160

Potential uplift of residents who will contribute \$2.2 million p.a. to the local economy

SHORT TERM ACCOMMODATION GAP ASSESSMENT



Note: Data is as at June
Source: TRA; Cordell; Urbis

07

THE SERVICED APARTMENTS CANNOT BE CONVERTED INTO ANOTHER EMPLOYMENT GENERATING USE

With construction already well progressed, the portion of the development which occupies serviced apartments is already built as apartments, so there is no other conversion options but residential.

The project commenced construction in late 2020, so construction has already been underway for close to one year and the majority of floors have already been built. As the 60 serviced apartments are on Levels 3 to 12, this means they have already been built as serviced apartments.

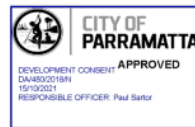
It is not possible to convert these floors to other employment uses such as commercial office. The existing ceiling heights and structural columns do not align with the design principles required by modern commercial office buildings.

Therefore, residential apartments are the only viable conversion of use for the previously approved 60 serviced apartments.



Street level view of construction progress of the subject site as at June 2021





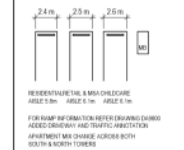
#	Issue	Description	Date
1	Initial	Initial	22.05.18
2	Revised	Revised	28.06.18
3	Revised	Revised	28.06.18
4	Revised	Revised	28.06.18
5	Revised	Revised	28.06.18
6	Revised	Revised	28.06.18
7	Revised	Revised	28.06.18
8	Revised	Revised	28.06.18
9	Revised	Revised	28.06.18
10	Revised	Revised	28.06.18
11	Revised	Revised	28.06.18
12	Revised	Revised	28.06.18
13	Revised	Revised	28.06.18
14	Revised	Revised	28.06.18
15	Revised	Revised	28.06.18
16	Revised	Revised	28.06.18
17	Revised	Revised	28.06.18
18	Revised	Revised	28.06.18
19	Revised	Revised	28.06.18
20	Revised	Revised	28.06.18
21	Revised	Revised	28.06.18
22	Revised	Revised	28.06.18

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

- BOUNDARY LINE
- HEIGHT RELATIVE TO A.H.D.
- REQUIRED STORAGE
- BACK OF HOUSE
- EXISTING RETAIL NOT IN SCOPE
- EXISTING BUILDING
- RAMP APPROACHING POINT UP

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE
FOR ADD COMPLIANCE, AREAS
AND UNIT MIX

Rating Schedule (L)	Count
1	1
2	1
3	1
4	1



Project: CHARLES & GEORGE
PARRAMATTA NSW

Client: MERITON

Author: WOODS BAGOT

Project number: 121070

Drawn: SWM, Approved: BW, Scale: As indicated

Sheet title: FLOOR PLAN LEVEL 3 PODIUM

Sheet number: DA2203

Revision: V

Status: DEVELOPMENT APPLICATION



#	Issue	Description	Date
1	Initial	Initial	15.04.18
2	Consultation Update	Consultation Update	22.05.18
3	Preliminary DA Issue	Preliminary DA Issue	08.06.18
4	DA Issue	DA Issue	22.06.18
5	DA Release	DA Release	26.10.18
6	DA Release	DA Release	09.03.19
7	DA Release Information for Council	DA Release Information for Council	17.03.19
8	DA Release	DA Release	21.02.20
9	DA Issue	DA Issue	14.03.20
10	Planning Proposal - Conversion of L3, L4 to Residential	Planning Proposal - Conversion of L3, L4 to Residential	03.02.21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

- BOUNDARY LINE
- HEIGHT RELATIVE TO AHD
- REQUIRED STORAGE
- BOH - BACK OF HOUSE
- EXISTING RETAIL NOT IN SCOPE
- EXISTING BUILDING
- RAMP ARROWS POINT UP

See CONSTRUCTION SCHEDULE FOR ADDITIONAL PROJECT AREA SCHEDULE FOR ADDITIONAL COMPLIANCE AREAS AND UNIT MIX



Project: CHARLES & GEORGE PARRAMATTA NSW

Client:

MERITON

Builder:
WOODS BAGOT

Project Report
Project number: 121070
Checked: SWM
Approved: BW
Scale: As indicated

Sheet title:
**FLOOR PLAN
LEVEL 4 PODIUM ROOFTOP**

Sheet number: DA2204
Revision: P
Status: DEVELOPMENT APPLICATION



#	Station	Description	Date
A		Initial Consultation Set	26.10.17
B		Concept Design	13.03.18
C		Preliminary DA Issue	08.06.18
D		DA Issue	22.06.18
E		DA Release	26.10.18
F		DA Release	09.03.19
G		DA Release Information for	17.05.19
H		DA Release	21.02.20
I		Planning Proposal - Conversion of L3-12 to Residential	03.12.21

Notes & Legend
 Construction must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

- BOUNDARY LINE
- AL 1800, REUSE
- HEIGHT RELATIVE TO A.H.D
- GEPPS REQUIRED STORAGE
- BOH - BACK OF HOUSE
- EXISTING RETAINMENT IN SCOPE
- EXISTING BUILDING
- RAMP APPROX POINT UP

5m CONSTRUCTION GRID
 REFER PROJECT AREA SCHEDULE FOR ADO COMPLIANCE, AREAS AND UNIT MIX



Project
 CHARLES & GEORGE
 PARRAMATTA NSW

Client

MERITON

Issuer

WOODS BAGOT

Project Name

121070

Project Number

DA2205

Project Name

FLOOR PLAN

LEVEL 5 APARTMENTS

Project Name

DA2205

Project Number

L

Project Name

DEVELOPMENT APPLICATION



#	Issue	Description	Date
A	Issue	DA Issue	23.06.19
B	Issue	DA Review	26.06.19
C	Issue	DA Review	04.03.19
D	Issue	DA Review	17.03.19
E	Issue	DA Review	09.07.19
F	Issue	DA Review	21.02.20
G	Issue	DA Review	03.12.21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

AL 1000	BOUNDARY LINE
AL 1000	HEIGHT RELATIVE TO A.H.D
AL 1000	REQUIRED STORAGE
AL 1000	BACK OF HOUSE
AL 1000	EXISTING RETAINMENT IN SCOPE
AL 1000	EXISTING BUILDING
AL 1000	RAMP APPROX POINT UP

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE FOR ADD COMPLIANCE, AREAS AND UNIT MK

ADDITIONAL, BROWNS FOR BRICKED STRUCTURES AS RESTRICTED BY PARAMATTA COUNCIL



Project: CHARLES & GEORGE
PARRAMATTA NSW

Client:

MERITON

Issue:
WOODS BAGOT

#	Issue	Issue	Issue
1	Project number	121070	Issue
2	Checked	Approved	Scale
3	SW	SW	As indicated

Sheet title:
**FLOOR PLAN
LEVEL 6 APARTMENTS**

Sheet number:
DA2206
Revision:
H
Status:
DEVELOPMENT APPLICATION



#	Issue	Description	Date
A	Issue	DA Issue	20/06/18
B	DA Review	DA Review	26/06/18
C	DA Review	DA Review	04/03/19
D	DA Update	DA Update	17/03/19
E	DA Update	DA Update	09/07/19
F	DA Update	DA Update	21/02/20
G	DA Update	DA Update	03/10/21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

AL 1600	BOUNDARY LINE
AL 1600	HEIGHT RELATIVE TO A.H.D.
SEPP100	REQUIRED STORAGE
BOH	BACK OF HOUSE
EXISTING RETAINMENT IN SCOPE	
EXISTING BUILDING	
RAMP APPROX POINT UP	

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE
FOR ADD COMPLIANCE, AREAS
AND UNIT MIX

ADDITIONAL BROWNS FOR BROWNS STRUCTURES
AS INSTRUCTED BY PARRAMATTA COUNCIL



Project
CHARLES & GEORGE
PARRAMATTA NSW

Client

MERITON

Issue
**WOODS
BAGOT**

Project Name	121070	Site check	20m
Checked	Approved	Sheet size	A1
SW	SW	Scale	As indicated

Sheet title
**FLOOR PLAN
LEVEL 7 APARTMENTS**

Sheet number
DA2207

Revision
H

Status
DEVELOPMENT APPLICATION



#	Issue	Description	Date
A	Issue	DA Issue	20.06.18
B	Issue	DA Review	26.06.18
C	Issue	DA Review	04.03.19
D	Issue	DA (Updated information by Council)	17.03.19
E	Issue	DA (Updated information by Council)	09.07.19
F	Issue	Section 8.0.0.0 Issue	21.02.20
G	Issue	Planning Proposal - Conversion of L3-12 to Residential	02.10.21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

AL 100% BLUE	BOUNDARY LINE
HEIGHT RELATIVE TO A.H.D.	
GEPPS	REQUIRED STORAGE
BOH	BACK OF HOUSE
EXISTING RETAINMENT IN SCOPE	
EXISTING BUILDING	
RAMP APPROX POINT UP	

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE FOR ADD COMPLIANCE, AREAS AND UNIT MIX

ADDITIONAL, BROWNS FOR BRICKED STRUCTURES AS INSTRUCTED BY PARRAMATTA COUNCIL



Project:
CHARLES & GEORGE
PARRAMATTA NSW

Client:

Meriton

Woods Bagot

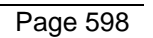
#	Month	Page	Issue	Check
1	12/10/20	1	Issue	20/06/18
2	12/10/20	2	Issue	20/06/18
3	12/10/20	3	Issue	20/06/18
4	12/10/20	4	Issue	20/06/18
5	12/10/20	5	Issue	20/06/18
6	12/10/20	6	Issue	20/06/18
7	12/10/20	7	Issue	20/06/18
8	12/10/20	8	Issue	20/06/18
9	12/10/20	9	Issue	20/06/18
10	12/10/20	10	Issue	20/06/18
11	12/10/20	11	Issue	20/06/18
12	12/10/20	12	Issue	20/06/18
13	12/10/20	13	Issue	20/06/18
14	12/10/20	14	Issue	20/06/18
15	12/10/20	15	Issue	20/06/18
16	12/10/20	16	Issue	20/06/18
17	12/10/20	17	Issue	20/06/18
18	12/10/20	18	Issue	20/06/18
19	12/10/20	19	Issue	20/06/18
20	12/10/20	20	Issue	20/06/18
21	12/10/20	21	Issue	20/06/18
22	12/10/20	22	Issue	20/06/18

Sheet Title:
FLOOR PLAN
LEVEL 8 APARTMENTS

Sheet number:
DA2208

Revision:
H

Status:
DEVELOPMENT APPLICATION





#	Issue	Description	Date
A	Issue	DA Issue	20/06/18
B	Issue	DA Review	26/06/18
C	Issue	DA Review	04/02/19
D	Issue	DA Updated information by Council	17/02/19
E	Issue	DA Updated information by Council	09/07/19
F	Issue	Section 6.1.1 Issue	21/02/20
G	Issue	Planning Proposal - Conversion of L3-12 to Residential	02/10/21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

AL 1000	BOUNDARY LINE
AL 1000	HEIGHT RELATIVE TO A.H.D.
SEPP10	REQUIRED STORAGE
BOH	BACK OF HOUSE
EXISTING RETAIL/IN	EXISTING RETAIL/IN
EXISTING	EXISTING BUILDING
RAMP	RAMP AFFORDS POINT UP

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE FOR ADD COMPLIANCE, AREAS AND UNIT MIX

ADDITIONAL ROOMS FOR BRICKED STRUCTURES ARE RESTRICTED BY PARAMATTA COUNCIL



Project: CHARLES & GEORGE PARRAMATTA NSW

Client: MERITON

Issue: WOODS BAGOT

Project: 121070
Project number: 121070
Checked: SW
Approved: SW
Issue check: 20/06/18
Issue date: A1
Scale: As indicated

Sheet title: FLOOR PLAN LEVEL 10 APARTMENTS

Sheet number: DA2210
Revision: H
Status: DEVELOPMENT APPLICATION



#	Issue	Description	Date
A	DA Issue	DA Issue	20.06.18
B	DA Review	DA Review	26.06.18
C	DA Review	DA Review	04.03.19
D	DA Update/variation by Council	DA Update/variation by Council	17.03.19
E	DA Update/variation by Council	DA Update/variation by Council	09.07.19
F	DA Issue	DA Issue	21.02.20
G	Planning Proposal	Planning Proposal	02.12.21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

AL 1000	BOUNDARY LINE
AL 1000	HEIGHT RELATIVE TO A.H.D.
SEPP10	REQUIRED STORAGE
BOH	BACK OF HOUSE
EXISTING RETAIL/IN SCOPE	
EXISTING BUILDING	
RAMP APPROX POINT UP	

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE FOR ADD COMPLIANCE, AREAS AND UNIT MIX

ADDITIONAL ROOMS FOR BRICKED STRUCTURES AS RESTRICTED BY PARAMATTA COUNCIL



Project:
CHARLES & GEORGE
PARRAMATTA NSW

Client:
MERITON

Issue:
WOODS BAGOT

#	Month	Page	Size	Check
1	12/10/20	12/10/20	20mm	
2	12/10/20	12/10/20	20mm	
3	12/10/20	12/10/20	20mm	

Sheet Title:
FLOOR PLAN
LEVEL 11 APARTMENTS

Sheet number:
DA2211

Revision:
H

Status:
DEVELOPMENT APPLICATION



Revision	Revision	Date
A	Issue	20.06.19
B	DA Review	26.06.19
C	DA Review	04.07.19
D	DA (Updated information by Council)	17.07.19
E	DA (Updated information by Council)	09.07.19
F	Section 6.1.1.1 Issue	21.07.19
G	Planning Proposal - Conversion of L3-12 to Residential	02.10.21

Notes & Legend
Contractor must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

AL 1000	BOUNDARY LINE
AL 1000	HEIGHT RELATIVE TO A.H.D.
REUSE	REQUIRE STORAGE
BOH	BACK OF HOUSE
EXISTING RETAIL IN SCOPE	EXISTING BUILDING
RAMP AFFORDS POINT UP	RAMP AFFORDS POINT UP

5m CONSTRUCTION GRID
REFER PROJECT AREA SCHEDULE FOR ADD COMPLIANCE, AREAS AND UNIT MK

ADDITIONAL, BETWEEN PROPOSED STRUCTURES ARE RESTRICTED BY PARALLEL TO CORNER



Project: CHARLES & GEORGE
PARRAMATTA NSW

Client:

MERITON

Issue:
WOODS BAGOT

Project Name	Project Number	Issue Check
121070	2000	2000
Checked	Approved	Scale
SW	AW	As indicated

Sheet Title:
**FLOOR PLAN
LEVEL 12 APARTMENTS**

Sheet Number:
DA2212
Revision:
H
Status:
DEVELOPMENT APPLICATION

1:1000 SCALE
SOUTHERN ELEVATION GEORGE STREET

CHARLES ST

WEST MOST CORNER BOUNDARY

EXISTING BUILDING B

CERTAIN COLOUR BACK GLAZED
SPANDREL PANELS CHANGED

BUILDING A

BUILDING D BEHIND

EAST MOST CORNER BOUNDARY

Planning proposal -
Conversion of L3-12
to Residential

Revision	Description	Date
1	Issue	22.05.18
2	DA Issue	28.10.18
3	DA Release	04.03.19
4	DA Submission/Revision	08.07.19
5	Updated DA/Revision	21.10.19
6	Submission DA Issue	21.03.20
7	DA Issue	14.03.20
8	Setback 4.00 - Plan Changes	18.09.21
9	Revised North Tower Set Back	10.09.21
10	Changes to Balcony & Facade	17.09.21
11	Planning Proposal - Conversion of L3, L7 to Residential	09.12.21

Notes & Legend
Consultant must verify all dimensions on site before commencing work or preparing shop drawings. Do not scale drawings.

ADDITIONAL ELEVATION SHADING STRUCTURES REFER FLOORPLANS

TOWER LEGEND

VISION PANELS	VISION PANELS
BL-81 LIGHT COLOUR - VANCEVA 0807	BL-81 LIGHT COLOUR - VANCEVA 0807
BL-82 MEDIUM COLOUR - VANCEVA 0807	BL-82 MEDIUM COLOUR - VANCEVA 0807
BL-83 DARK COLOUR - VANCEVA 0807	BL-83 DARK COLOUR - VANCEVA 0807
BL-84 CLARK GLASS	BL-84 CLARK GLASS
COLOUR BACK GLAZED SPANDREL PANELS	COLOUR BACK GLAZED SPANDREL PANELS
SP-81 LIGHT COLOUR - DALLUX UNFORGETTABLE	SP-81 LIGHT COLOUR - DALLUX UNFORGETTABLE
SP-82 MEDIUM COLOUR - DALLUX WATER ROCK	SP-82 MEDIUM COLOUR - DALLUX WATER ROCK
SP-83 DARK COLOUR - DALLUX TEXAS TEA	SP-83 DARK COLOUR - DALLUX TEXAS TEA
SP-84 DARKER COLOUR - DALLUX EAGLE WING	SP-84 DARKER COLOUR - DALLUX EAGLE WING

ALUMINIUM/CFRC COLOURS	ALUMINIUM/CFRC COLOURS
AL-81 POWDERCOAT - MATT CHAMPAGNE	AL-81 POWDERCOAT - MATT CHAMPAGNE
AL-82	AL-82
AL-83 COMPRESSED FIBRE CEMENT - SOUTHERN NATURAL WHITE	AL-83 COMPRESSED FIBRE CEMENT - SOUTHERN NATURAL WHITE
AWNING WINDOW	AWNING WINDOW
BALCONY OPENING	BALCONY OPENING
VERTICAL LOUVRE	VERTICAL LOUVRE



Client
MERITON
Project
CHARLES & GEORGE
PARRAMATTA NSW

Project number
WOODS BAGOT

Project number
121070
Checked
HT

Drawn
JF
Scale
As indicated

Project title
**ELEVATIONS
SOUTHERN ELEVATION**

Sheet number
DA-3202
Revision
R
Status
DEVELOPMENT APPLICATION



OVERVIEW

Urbis has been commissioned by Meriton to prepare a report to highlight the key reasons why their proposal to convert the remaining 60 serviced apartments at 180 George Street, Parramatta (subject site) into residential apartments should be supported.

Key reasons the proposed conversion at 180 George Street should be supported include:

- 01 Covid-19 has delivered the short stay accommodation industry a significant blow.
- 02 The Parramatta CBD has a large supply pipeline of hotels and serviced apartments.
- 03 The short stay sector is expected to experience a slow recovery from Covid-19 due to the increasing future supply.
- 04 The subject site has a relatively weak competitive positioning for serviced apartments.
- 05 The conversion will lead to a minimal loss of jobs and economic contribution to the local economy.
- 06 The conversion will generate an additional \$2.2 million in retail spending annually that will support existing and new businesses.
- 07 The serviced apartments cannot be converted into another employment generating use due to building constraints.

01

COVID-19 HAS DELIVERED THE SHORT TERM ACCOMMODATION INDUSTRY A SIGNIFICANT BLOW

The impacts of Covid-19 on the short term accommodation are evident through the dramatic drop in occupancy experienced across Meriton's serviced apartment portfolio.

In the year prior to Covid-19 the Meriton Serviced Apartments national portfolio performed strongly with an average occupancy of 87% for the year.

High average occupancy of 88% was recorded in their NSW portfolio, including a 91% rate at their 254-room establishment at 330 Church Street, Parramatta.

As Covid-19 resulted in domestic and international border closures, long periods of city-wide lockdowns and working from home conditions their portfolio took a drastic hit.

Throughout the first 12 months of Covid-19, from April 2020 to March 2021 Meriton's National portfolio experienced a significant 43% percentage point drop in average occupancy, which is consistent with the wider short term accommodation market. NSW recorded an overall 45% percentage point drop and Parramatta

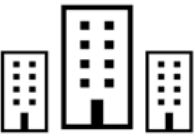


occupancy has dropped by a third to average 58%.

During the second (and longest) lockdown period in Greater Sydney, from June 2021 to October 2021, Meriton Parramatta recorded its lowest occupancy at only 38%, reflecting a dramatic 53% drop from pre Covid-19 levels. This dramatic drop and average low occupancy throughout Covid-19 has had major financial impacts on Meriton.



Meriton Parramatta occupancy
reached as low as **38%**
↓ 53 percentage point drop
from Pre Covid-19

IMPACT OF COVID-19 ON MERITON SERVICED APARTMENTS

Meriton Serviced Apartments	Pre Covid-19 Occupancy*	Covid-19 Occupancy**	Covid-19 Impact
 PARRAMATTA	91%	58%	↓ 33%
 NSW	88%	43%	↓ 45%
 NATIONAL	87%	44%	↓ 43%

Note: *indicates the Pre Covid-19 period as April 2019 to March 2020, **indicates Covid-19 Occupancy period as April 2020 to March 2021
Source: Meriton; Urbis

02 THE PARRAMATTA CBD ALREADY HAS A LARGE SUPPLY PIPELINE OF HOTELS AND SERVICED APARTMENTS

The proposed pipeline of short term accommodation facilities within the Parramatta CBD is expected to result in the existing supply increasing 2.5x by 2027.

There are currently 936 hotel rooms and 346 serviced apartments within the Parramatta CBD, equating to a total of 1,282 short term accommodation units.

With a proposed pipeline of 1,538 hotel rooms and 274 serviced apartments expected to be delivered by 2027, the number of short term accommodation units will grow to 3,094. This increase equates to the Parramatta CBD short term accommodation supply increasing by 2.5x.

As there is such a large supply pipeline, the proposed conversion of the remaining approved 60 serviced apartments into residential units at the subject site, will only result in a 3% decrease in total supply by 2027.

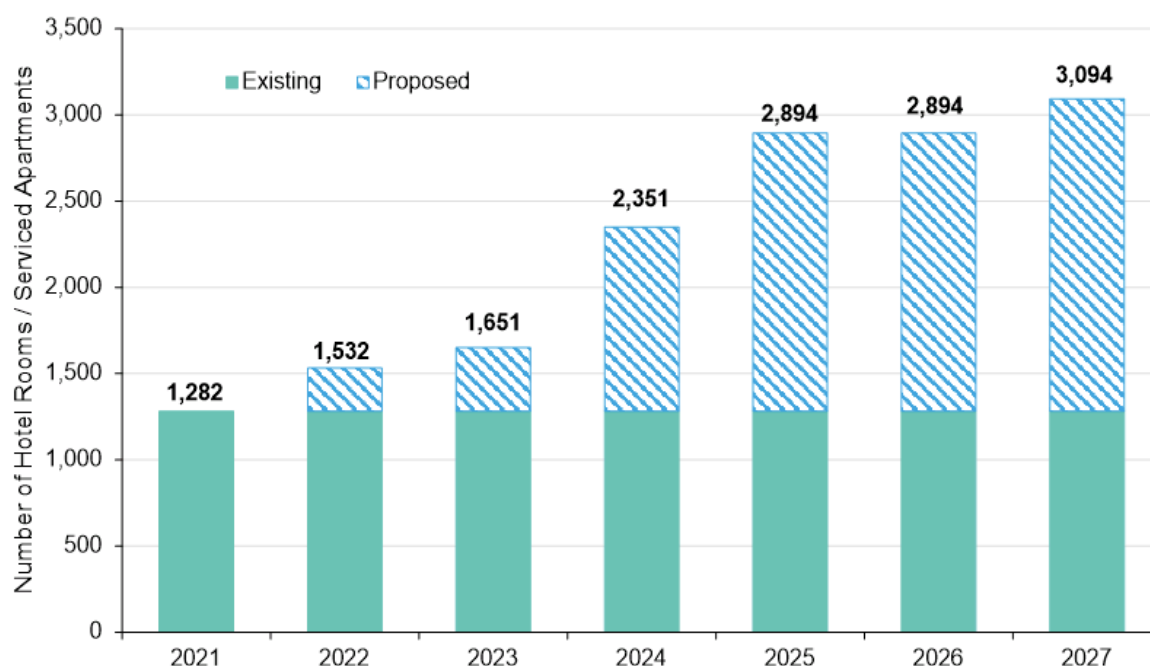
2.5x

Parramatta CBD Short Term Accommodation Supply is expected to nearly triple by 2027

↓3%

The proposed conversion will have a minimal impact on Short Term Accommodation Supply by 2027

SHORT TERM ACCOMMODATION SUPPLY



Source: Cordell; Urbis

03 THE SHORT STAY SECTOR IS EXPECTED TO EXPERIENCE A SLOW RECOVERY FROM COVID-19

The chart below shows the projected future occupancy rate of short term accommodation facilities in the Parramatta CBD.

Covid-19 had a major negative impact on the performance of existing establishments as average occupancy dropped from 84% in 2019 to 43% in 2021.

We forecast that visitation and room demand will recover in 2022 onwards as international borders reopen and domestic travel picks up. Growth will be driven by population growth, new infrastructure and commercial development within the Parramatta CBD.

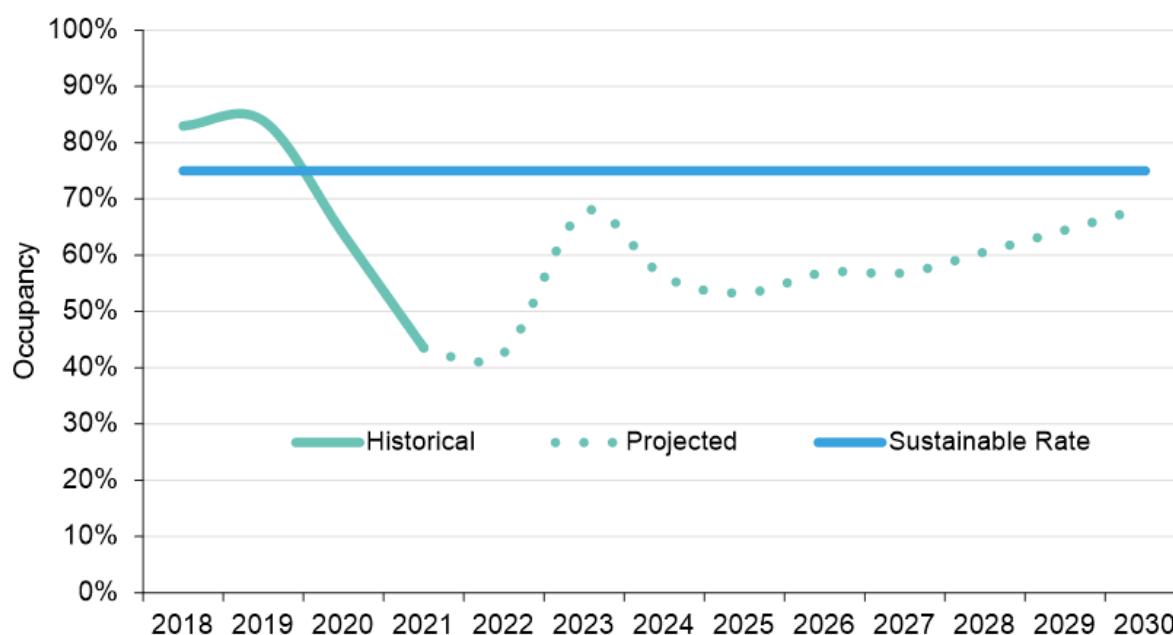
However, demand will likely be permanently impacted by Covid-19 in Parramatta CBD, as business travel accounts for a significant market share. As remote working conditions have flourished throughout Covid-19, aided by advances in remote working technology, it

is likely businesses will embrace remote working moving forward. Therefore it is unlikely business related travel will return to pre Covid-19 levels.

The chart below compares forecast demand with future supply to understand potential occupancy rates across the market. Occupancies are forecast to increase in the short term as the sector recovers from Covid-19, reaching 68% in FY23. Occupancies are then forecast to decline to 53% by 2025 due to the proposed supply pipeline far outweighing additional demand.

Even as occupancy in the Parramatta CBD starts to pick up beyond 2025 and new supply starts to be absorbed by additional demand, occupancies are expected to stay well below the sustainable occupancy rate of 75% until at least 2030 and will take even longer to return to the pre-Covid average occupancy rate of 84%.

PARRAMATTA CBD SHORT TERM ACCOMMODATION OCCUPANCY PROJECTIONS



Note: Data is as at June

Source: TRA; ABS; Cordell; Urbis

04 THE SUBJECT SITE HAS A RELATIVELY WEAK COMPETITIVE POSITIONING FOR SERVICED APARTMENTS

Many existing and proposed high quality short term accommodation facilities are better placed in the Parramatta CBD than the subject site to attract future visitors.

The map below shows that the subject site is on the eastern periphery of the Parramatta CBD and disconnected from the commercial core compared to other establishments rated at least 4 stars.

The commercial core of the CBD is the area largely bounded by Marsden Street, Smith Street, Parramatta River and the train line. Establishments within the core are better placed as they have easier access to offices, retail and transport.

As the large supply pipeline will create intense competition among facilities, particularly as the industry recovers from Covid-19 and occupancy remains below

the sustainable occupancy rate, strong competitive positioning is vital. High quality and large facilities with a better positioning than the subject site include:

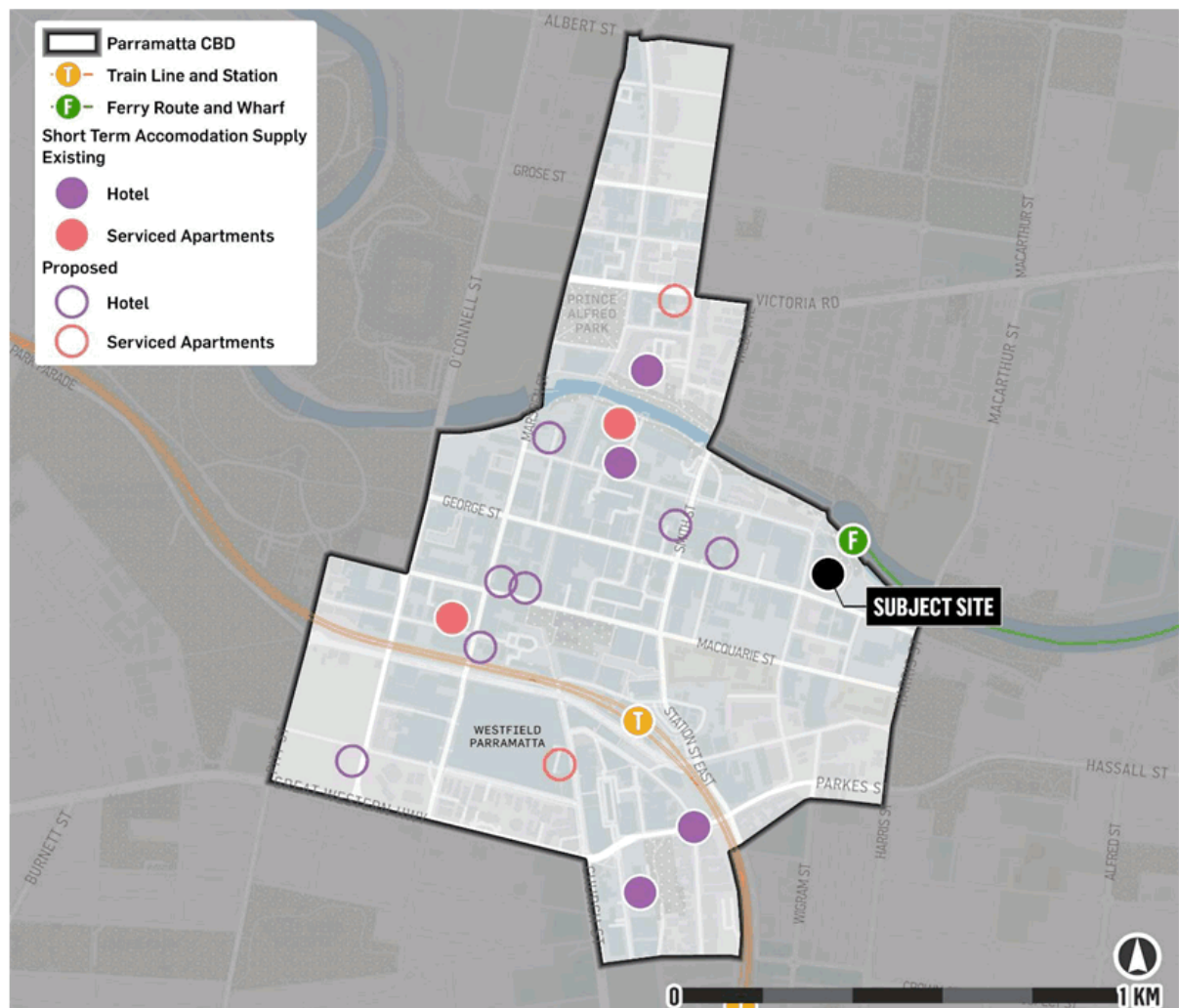
Existing

- Meriton Suites Church Street (254 rooms and 5 stars)
- Park Royal Parramatta (286 rooms and 4.5 stars)

Proposed

- Hilton Parramatta (245 rooms and 5 stars)
- QT Hotel (250 rooms and 5 stars)
- Intercontinental Hotel (200 rooms and 5 stars).

PARRAMATTA CBD SHORT TERM ACCOMMODATION CONTEXT



05 LIMITED LOSS OF JOBS AND ECONOMIC CONTRIBUTION TO THE LOCAL ECONOMY

According to benchmarks from Meriton on full-time staff per room across their service apartment portfolio, the conversion of the remaining 60 serviced apartments will only result in a loss of five full-time jobs.

Close to 3,500 sq.m of other stronger employment generating uses proposed on the site including retail, food and beverage, a childcare centre and a supermarket will still generate new employment. Based on industry standard job density benchmarks the ongoing operations of these uses will still be able to support 133 jobs, resulting in only a 4% reduction in jobs supported if the conversion were approved. As Meriton had planned to service the subject site as a satellite operation to their larger Church Street offer, the potential loss of jobs could be even less than 4%.

In addition to the 133 direct on-site jobs, the ongoing operation of the other uses still proposed is forecast to support a further 28 indirect jobs through flow-on economic multiplier effects. More so, the continued operations will deliver around \$15 million gross value add to the local economy each year.

Around 400 - 500 jobs will continue to be generated by the development during the construction period. With residential apartments requiring the same high level of design as serviced apartments, the construction cost will remain largely unchanged. In effect, the supported jobs and economic contribution to the local economy will remain the same as previously approved.

DIRECT ONGOING EMPLOYMENT

Land Use	Provision	Job Density	Ongoing Jobs
Supermarket	1,918 sq.m	25 sq.m per job	77
Retail / Food and Beverage	976 sq.m	25 sq.m per job	39
Childcare	598 sq.m	35 sq.m per job	17
Serviced Apartments proposed to be converted	60 rooms	12 sq.m per job	5
Total Approved Jobs			138 jobs
Total Jobs if Serviced Apartments are converted			133 jobs
Impact (%)			- 4%

Source: Meriton; Landcom, City of Sydney FES 2017; Urbis

+/- 0%

Construction jobs and project expenditure will remain unchanged

↓ 4%

Minimal loss of ongoing jobs supported on site



133

Direct Jobs



28

Indirect Jobs



150

Total Jobs



\$15 million GVA p.a.

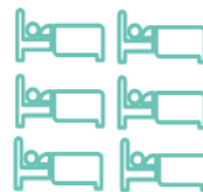
Expected contribution of the ongoing operations of the site to the local economy

06

THE CONVERSION TO RESIDENTIAL WILL GENERATE AN ADDITIONAL \$2.2 MILLION ANNUALLY IN RETAIL SPENDING THAT WILL SUPPORT EXISTING AND NEW BUSINESSES

Another consideration when converting the remaining serviced apartments to residential apartments is the potential loss of tourists and their spending in the Parramatta CBD. The chart below shows there is expected to be a considerable oversupply of 962 short term accommodation units in 2030, even as the serviced apartments are removed from the pipeline. This oversupply indicates there will be no loss of tourists within the Parramatta CBD, as they will be easily catered for by other high quality developments.

The new 60 residential units also have the potential to support around 160 new residents within the Parramatta CBD. These residents will bring in additional \$2.2 million of annual retail spending that will benefit existing and new businesses. This additional spending will far outweigh the potential economic loss to the local economy from losing five ongoing jobs, and no change to tourists spending.



+/- 0

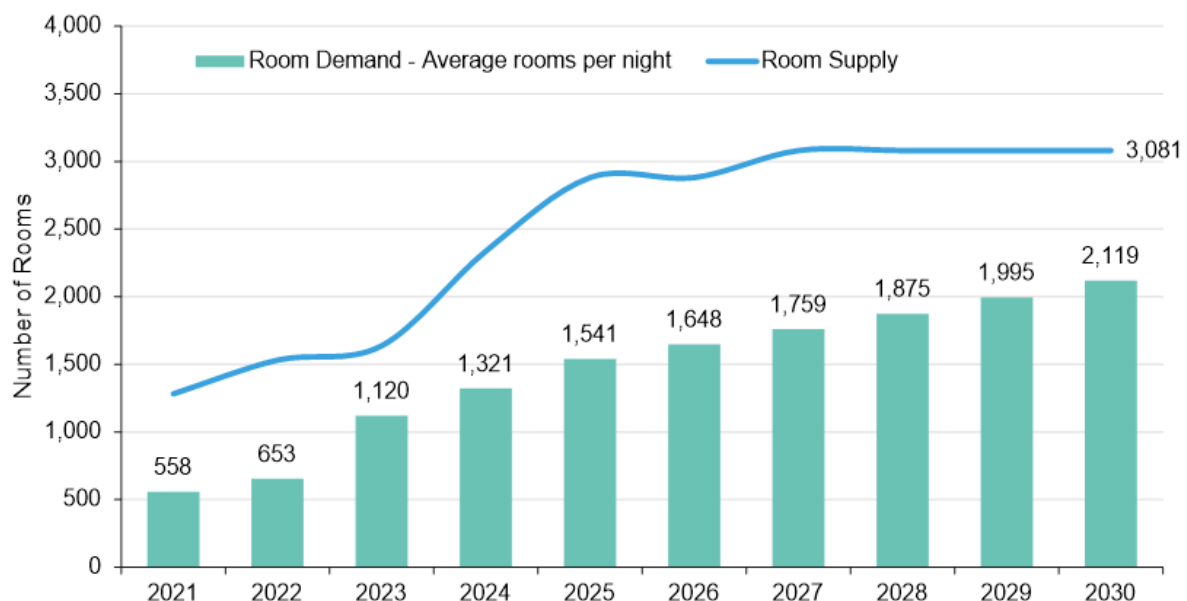
No loss of tourist as hotel supply will easily absorb demand



+160

Potential uplift of residents who will contribute \$2.2 million p.a. to the local economy

SHORT TERM ACCOMMODATION GAP ASSESSMENT



Note: Data is as at June
Source: TRA; Cordell; Urbis

07

THE SERVICED APARTMENTS CANNOT BE CONVERTED INTO ANOTHER EMPLOYMENT GENERATING USE

With construction already well progressed, the portion of the development which occupies serviced apartments is already built as apartments, so there is no other conversion options but residential.

The project commenced construction in late 2020, so construction has already been underway for close to one year and the majority of floors have already been built. As the 60 serviced apartments are on Levels 3 to 12, this means they have already been built as serviced apartments.

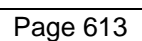
It is not possible to convert these floors to other employment uses such as commercial office. The existing ceiling heights and structural columns do not align with the design principles required by modern commercial office buildings.

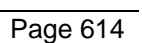
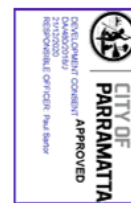
Therefore, residential apartments are the only viable conversion of use for the previously approved 60 serviced apartments.



Street level view of construction progress of the subject site as at June 2021









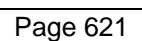


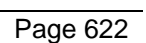












1:300 SCALE
SOUTHERN ELEVATION GEORGE STREET

CHARLES ST

WEST MOST CORNER BOUNDARY

EXISTING BUILDING B

CERTAIN COLOR BACK GLAZED
SPANDREL PANELS CHANGED

CERTAIN COLOR BACK GLAZED
SPANDREL PANELS CHANGED

EAST MOST CORNER BOUNDARY

Planning proposal -
Construction of L3-12
to residential

LOWER LEGEND

Color	Material
Light Grey	Light Grey Concrete
Dark Grey	Dark Grey Concrete
White	White Concrete
Light Blue	Light Blue Concrete
Dark Blue	Dark Blue Concrete
Light Green	Light Green Concrete
Dark Green	Dark Green Concrete
Light Yellow	Light Yellow Concrete
Dark Yellow	Dark Yellow Concrete
Light Orange	Light Orange Concrete
Dark Orange	Dark Orange Concrete
Light Red	Light Red Concrete
Dark Red	Dark Red Concrete
Light Purple	Light Purple Concrete
Dark Purple	Dark Purple Concrete
Light Pink	Light Pink Concrete
Dark Pink	Dark Pink Concrete
Light Brown	Light Brown Concrete
Dark Brown	Dark Brown Concrete
Light Tan	Light Tan Concrete
Dark Tan	Dark Tan Concrete
Light Cream	Light Cream Concrete
Dark Cream	Dark Cream Concrete
Light Ivory	Light Ivory Concrete
Dark Ivory	Dark Ivory Concrete
Light Beige	Light Beige Concrete
Dark Beige	Dark Beige Concrete
Light Gold	Light Gold Concrete
Dark Gold	Dark Gold Concrete
Light Silver	Light Silver Concrete
Dark Silver	Dark Silver Concrete
Light Steel	Light Steel Concrete
Dark Steel	Dark Steel Concrete
Light Aluminium	Light Aluminium Concrete
Dark Aluminium	Dark Aluminium Concrete
Light Zinc	Light Zinc Concrete
Dark Zinc	Dark Zinc Concrete
Light Copper	Light Copper Concrete
Dark Copper	Dark Copper Concrete
Light Nickel	Light Nickel Concrete
Dark Nickel	Dark Nickel Concrete
Light Titanium	Light Titanium Concrete
Dark Titanium	Dark Titanium Concrete
Light Vanadium	Light Vanadium Concrete
Dark Vanadium	Dark Vanadium Concrete
Light Niobium	Light Niobium Concrete
Dark Niobium	Dark Niobium Concrete
Light Manganese	Light Manganese Concrete
Dark Manganese	Dark Manganese Concrete
Light Silicon	Light Silicon Concrete
Dark Silicon	Dark Silicon Concrete
Light Boron	Light Boron Concrete
Dark Boron	Dark Boron Concrete
Light Fluorine	Light Fluorine Concrete
Dark Fluorine	Dark Fluorine Concrete
Light Chlorine	Light Chlorine Concrete
Dark Chlorine	Dark Chlorine Concrete
Light Sulfur	Light Sulfur Concrete
Dark Sulfur	Dark Sulfur Concrete
Light Phosphorus	Light Phosphorus Concrete
Dark Phosphorus	Dark Phosphorus Concrete
Light Nitrogen	Light Nitrogen Concrete
Dark Nitrogen	Dark Nitrogen Concrete
Light Oxygen	Light Oxygen Concrete
Dark Oxygen	Dark Oxygen Concrete
Light Hydrogen	Light Hydrogen Concrete
Dark Hydrogen	Dark Hydrogen Concrete
Light Helium	Light Helium Concrete
Dark Helium	Dark Helium Concrete
Light Lithium	Light Lithium Concrete
Dark Lithium	Dark Lithium Concrete
Light Beryllium	Light Beryllium Concrete
Dark Beryllium	Dark Beryllium Concrete
Light Magnesium	Light Magnesium Concrete
Dark Magnesium	Dark Magnesium Concrete
Light Calcium	Light Calcium Concrete
Dark Calcium	Dark Calcium Concrete
Light Strontium	Light Strontium Concrete
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Light Barium	Light Barium Concrete
Dark Barium	Dark Barium Concrete
Light Radium	Light Radium Concrete
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Light Thorium	Light Thorium Concrete
Dark Thorium	Dark Thorium Concrete
Light Protactinium	Light Protactinium Concrete
Dark Protactinium	Dark Protactinium Concrete
Light Uranium	Light Uranium Concrete
Dark Uranium	Dark Uranium Concrete
Light Neptunium	Light Neptunium Concrete
Dark Neptunium	Dark Neptunium Concrete
Light Plutonium	Light Plutonium Concrete
Dark Plutonium	Dark Plutonium Concrete
Light Americium	Light Americium Concrete
Dark Americium	Dark Americium Concrete
Light Curium	Light Curium Concrete
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Light Berkelium	Light Berkelium Concrete
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Light Californium	Light Californium Concrete
Dark Californium	Dark Californium Concrete
Light Einsteinium	Light Einsteinium Concrete
Dark Einsteinium	Dark Einsteinium Concrete
Light Fermium	Light Fermium Concrete
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Light Nobelium	Light Nobelium Concrete
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Light Lawrencium	Light Lawrencium Concrete
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Light Rutherfordium	Light Rutherfordium Concrete
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Light Dubnium	Light Dubnium Concrete
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Light Seaborgium	Light Seaborgium Concrete
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Light Bohrium	Light Bohrium Concrete
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Light Hassium	Light Hassium Concrete
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Light Copernicium	Light Copernicium Concrete
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Light Oganesson	Light Oganesson Concrete
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ALTERNATIVE COLORS

Color	Material
Light Grey	Light Grey Concrete
Dark Grey	Dark Grey Concrete
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MERITON

CHARLES & GEORGE
PARAMOUNT NSW

PROPOSAL

DA 2022
R
DEVELOPMENT APPLICATION

STATIONS
SOUTHERN ELEVATION

DA 2022
R
DEVELOPMENT APPLICATION

