

Our Ref: 600330-003
Contact: Jenny Smithson

19 May, 2015

Ms Joanna Bakopanos
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Joanna,

**SECTION 75W REQUEST TO MODIFY THE MINISTER'S APPROVAL OF PROJECT APPLICATION
MP08_0157 MOD3 – OFFICE EXPANSIONS TO JWM MINTO MALTING PLANT**

Further to our refer discussions, Cardno hereby submits an Application and Environmental Assessment lodged pursuant to section 75W of the Environmental Planning and Assessment Act, 1979 (the Act). The Application is to modify the above Part 3A Consent on behalf of Cargill, the owners of the subject land referred to as the JWM Minto Maltings Plant.

Introduction

The requested modifications relate only to the expansion of the existing office building onsite by 137.8m² to facilitate Research + Development (R+D) activities. The extensions remain entirely within the existing development site and are proposed over an existing hardstand and garden.

The proposed modifications will have no impact on the industrial use of the site or the ongoing operations of the plant but will provide improved office accommodation and facilities for workers on the site. There will be no offsite impacts or need to change the existing layout of the plant.

In order to ensure the highest quality control of the dispatched malting product, JWM have determined there is a need for upgraded facilities to train their staff and undertake R+D on their product. This is the intended use of the expanded office building. The current office building is approximately 437m² with the proposed expansion to take it to approximately 574m², representing a 31% increase in the size of the existing offices. There will be an additional R+D Manager and an additional R+D Chemist employed for this expanded office building. There is sufficient office space and car parking available for the new manager and chemist on site.

Cardno considers the proposed modifications to be minor. Accordingly, we believe there is no requirement to notify the proposal with the exception of Campbelltown City Council who have always been supportive of the JWM facility since it commenced operation.

In addition to the required completed s75W Form and Political Donations Declaration Form (attached), the application comprises this letter and attached:

- Site Plan and Elevations; and
- Photos of the existing office building and the area to be occupied by the expansion.

Background

In May 2009, approval was granted to Joe White Maltings Pty Ltd (JWM) to construct a malt manufacturing and grain packing plant in Minto (Departmental Reference 08_0157). The plant was subsequently constructed and is now operating at capacity.

The original development consent for the JWM facility was granted under Part 3A of the Environmental Planning and Assessment Act 1979 (EP & A Act).

In April 2012, approval was granted to a Section 75W Modification Application for the transport of some goods by truck rather than train (MOD1). In June 2014, approval was granted to a second S75W application for the construction of up to an additional 12 storage silos on the site as MOD2 to the original consent. This application for an office expansion is therefore referred to by Cardno as MOD3.

The malt manufacturing that occurs on site involves processing barley into malt for use in the brewing process. JWM manages the malt manufacturing. The grain packing facility receives barley for JWM and dispatches the malt. Additionally, a variety of grains and pulses, not related to the malting process, are stored and distributed on site for export to customers.

An important component of the current operations is the quality testing of product and to ensure the latest processing and production techniques are used. There are some facilities within the existing lab contained within the current office for Research and Development (R+D) activities but these are insufficient to operate efficiently. Furthermore, there are limited facilities for staff working at the plant to undertake training activities onsite. The proposed expansion of the existing building will address these issues by providing an area dedicated to R+D and training activities.

This letter contains the Environmental Assessment (EA) required to assess the environmental impacts associated with the proposed office expansion.

This EA will provide the Department of Planning and Environment (DP+E) and other stakeholders with a document, which details the environmental impacts from the proposed development. Given the benign nature of what is proposed, no specialist reports on impacts are considered necessary as no significant adverse impacts will arise from the works.

Aims of the Environmental Assessment (EA)

This EA aims to demonstrate that:

- The proposed office expansion will adjoin the existing office and will present as an extension of that facility. It will match the existing office building in terms of height, scale and materials of construction.
- The extensions will be undertaken internal to the site and will not create any additional visual impact to that already existing when the development is viewed from public vantage points external to the site.
- The proposed upgraded office facilities will improve the operational efficiency of the development but otherwise will not materially alter existing processing or operational aspects of the development.
- There are no environmental constraints or likely adverse impacts which would prevent the proposed development.
- The expansion of the existing office building to accommodate R+D and training facilities will not have a significant environmental impact but will improve the existing operational efficiency of the plant and the quality of the finished product.

Scope of the Environmental Assessment

The scope of this EA is to discuss the extent of the environmental impacts from the office expansion proposed on the site.

Director General Requirements

The original EA was assessed under Part 3A as it was classified as a Major Project under the *Environmental Planning and Assessment Act 1979* (as amended).

Director General's Requirements (DGR's) were prepared for the original development. The Department of Planning and Environment (DP+E) has advised verbally that no new SEARs are required for the additional office space, however the relevant DGR's from the original proposal must be examined in light of the expansion of the facility now proposed.

Before release of the DGR's, the DP+E consulted with the following public authorities:

- Department of Environment & Climate Change (DECC)
- Campbelltown City Council
- Sydney Water
- Transport for NSW (formerly Railcorp).

Given the nature of the modifications to the development now proposed, the DP+E has informally advised that only the Council is likely to be consulted. Cardno understands from past discussions on site with Campbelltown City Council Planners that there are no issues with the existing JWM operation on the site. No likely issues are expected to arise as a result of the additional development now proposed.

Table 1 lists the original DGR's and identifies which are considered to be relevant to the current proposal and the location of each relevant matter in this document.

Table 1: Director General's Requirements (for the original Proposal)

Requirement	If Relevant and, if so, Where Addressed in this Letter
General Requirements	
An Executive Summary	N/A
A detailed description of the following: • Historical operations/activities on the site • Existing & approved operations/facilities, including any statutory approvals that apply to these operations and facilities.	N/A Refer section titled Current Site Development
A detailed description of the project, including the: • Need for the project • Alternatives considered, including a justification for the project • Likely staging of the project • Plans of any proposed building works.	Refer section titled Need for the project Refer section titled Alternatives to the proposed development N/A See Plans of building works in Attachment A
A risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment.	Refer section titled Environmental Risk Assessment
A detailed assessment of the key issues specified below, and any other significant issues identified in the risk assessment (see above), which includes: • A description of the existing environment, using sufficient baseline data • An assessment of the potential impacts of all stages of the project, including any cumulative impacts, taking into consideration any relevant statutory provisions, and technical or policy guidelines (see below) • A description of the measures that would be implemented to avoid, minimise, mitigate, remediate, monitor and/or offset the potential impacts of the project, including detailed contingency plans for managing any potentially significant risks to the	Refer section titled Current site development Refer sections titled Cumulative Impacts Refer section titled Risk Management for the site

environment.	
A statement of commitments, outlining all the proposed environmental management and monitoring measures.	N/A - The existing Statement of Commitments is adequate
A conclusion justifying the project on economic, social and environmental grounds, taking into consideration whether the project is consistent with the objects of the Environmental Planning & Assessment Act 1979.	Refer section titled Conclusion
A signed statement from the author of the Environmental Assessment, certifying that the information contained within the document is neither false nor misleading.	Signed Statement at conclusion of letter
Key Issues	
Air Quality and Odour - An assessment of all air pollutants from all sources during construction and operation and from road and rail transport, including any potential volatile organic compounds, particulates, odour and NOx - Details of all control measures, such as for odour, volatile organic compounds and NOx.	Not considered relevant to the office expansion proposal for the reasons outlined in this letter
Traffic and Transport – including: - A detailed transport impact study of the project on the performance and safety of the surrounding transport network (including road, rail and other public transport) and a description of the measures that would be implemented to upgrade and/or maintain this network over time - An assessment of the potential parking demand of the project - Detailed plans of the proposed layout of the internal road and rail network, site access and parking on site in accordance with the relevant Australian standards.	Not considered relevant to the office expansion proposal. There will be no additional traffic or parking generated as a result of adding R+D and training facilities to the existing office and no loss of parking to accommodate the expansion
Soil & Water – including: - A detailed water balance for the project, outlining the measures that would be implemented to minimise the use of water on site - Wastewater predictions, and the measures that would be implemented to treat, reuse and/or dispose of this water - The proposed erosion and sediment controls during construction - The proposed stormwater management system - Consideration of the potential salinity, contamination, flooding and acid sulphate soil impacts of the project.	Not considered relevant to the office expansion as it will utilise existing on site services with connection to reticulated water, drainage and sewer facilities. The existing services have sufficient capacity to accommodate the development proposed
Hazards and Risk – including: A Preliminary Hazard Analysis (PHA) of the project, including an assessment of the risks associated with the project, such as from the refrigeration facility and with handling combustible dusts.	Not considered relevant as no additional risks arise from the office expansion proposal
Noise and Vibration – including: Construction, operation and off site road and rail transportation noise	Post construction there will be no additional noise or vibration associated with the proposal. Construction will be in accordance with a Construction Management Plan
Visual – including: The design and articulation of the buildings (scale, height and bulk), and proposed lighting and signage; the proposed landscaping of the site; and the visual impacts of the proposal.	The R+D and training facilities will be accommodated in an extension to the existing office building which will reflect the design of that building. The extensions are unlikely to be visible outside the site and there will be no visual impact. Any landscaping lost will be replaced.
Greenhouse Gas – including: Calculations of the scope 1 and 2 emissions from the site, an assessment of the energy use on site, and describe what	Not considered relevant to the office expansion proposal as it will have no impact on Greenhouse

measures would be implemented to ensure the proposal is energy efficient.	Gas emissions
Waste – including: Accurate estimates of the quality and nature of the potential waste streams of the project during construction and operation, and a detailed description of the measures that would be implemented to minimise, reuse, recycle and dispose of this waste.	Waste post construction will be handled within the existing waste arrangements for the existing office with the amount of waste being minimal. Waste generated during Construction will be addressed in the Construction Management Plan
Development Controls – Demonstrate that the proposal is generally consistent with the development controls in the Campbelltown (Sustainable City) Development Control Plan 2007 and all other relevant development control plans, and justify any inconsistencies between the project and these controls.	Refer section of letter titled Local Planning Controls. The proposal will be consistent with the controls in the Campbelltown DCP
Developer Contributions and/or Planning Agreements – Review the project against any relevant contribution plans, and outline what contributions would be made towards the provision of local infrastructure or services.	Although there are two additional employees in the workforce as a result of the modification, there will be no changes to the operational output or capacity of the development. Therefore, no additional changes to Developer Contributions are considered warranted.
Consultation – During the preparation of the Environmental Assessment, you should consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups or affected landowners. In particular you must consult with the: • Department of Environment and Climate Change • Transport for NSW (formerly Railcorp) • Sydney Water • Campbelltown City Council The consultation process, and the issues raised during this process, must be described in the Environment Assessment.	Given the nature and intent of the development proposed, and following liaison with the DP+E, consultation is only intended to be undertaken with the Council and not the other agencies listed in the DGR's who were consulted during the assessment and approval of the original plant and office building

Overview of Proponent

At the time of the original approval, JWM was a fully owned subsidiary of ABB Grain. ABB Grain was the parent company of Joe White Maltings following a merger between ABB and JWM's former owner, AusBulk in 2004.

Since the plant has been constructed, JWM has again been sold, being purchased by private Australian firm, Cargill in November 2013 (see www.cargill.com.au).

Cargill has a company philosophy of operating in a sustainable responsible manner. The following statement is derived from the Corporate Responsibility statement found on the company's website:

When Cargill began in 1865, our business was founded on the belief that "our word is our bond." Today, as a diversified global company still grounded in a culture of trust and respect, this remains the standard by which we do business. We operate with integrity and accountability. We are committed to feeding the world in a responsible way; reducing our environmental impact; and improving the communities where we live and work. We are passionate about our goal to be the global leader in nourishing people and operating responsibly across the agricultural, food, industrial and financial markets we serve.

Cargill serves the country's large grain export industry and operates in several agricultural and industrial areas. These include oilseed and meat processing, grain and oilseed storage, and flour milling. Cargill Australia's headquarters are located in Melbourne.

JWM is a subsidiary of Cargill and continues to produce malt and to specialise in packaging wheat, barley, legumes and pulses from country storages into containers for export.

Being part of the Cargill group means that Cargill's corporate philosophy is being adopted throughout JWM's operations. It is Cargill's more stringent testing and quality requirements that have led to the need to have R+D facilities available on site necessitating the office expansion now proposed. There are no changes proposed to the capacity of the plant's operations or to the production volumes at the site.

Background and Requirement

JWM has malting plants in Tamworth, Perth, Port Adelaide, Devonport and Minto. The company produces product for export and domestic use. The Minto Plant was constructed to meet increasing customer demand overseas particularly in SE and north Asia. From the outset the plant has been operating at full capacity to meet demand. The malt manufacturing involves processing barley into malt for use in the brewing process and JWM manages the malt manufacturing. The grain packing facility (PGS) also operating on site receives barley for JWM and dispatches the malt. Additionally, PGS receives and packs into containers a variety of grains and pulses, not related to the malting process, for export customers.

The Minto site has been in successful operation since being commissioned in 2011. The plant is currently at full capacity. To improve operational efficiencies and to meet the high quality standards of the new parent company, Cargill, the office expansion is proposed to provide the capacity for R+D and training activities to be more efficiently undertaken onsite.

Site Location

The site is located at 11 Stonny Batter Road in Minto, approximately 5km north of Campbelltown in Sydney's south western suburbs (refer **Figure 1**).

This location is approximately 50km from the port of Port Botany and has access to the main Sydney to Melbourne railway line via an approved rail siding connecting through the adjoining Macarthur Intermodal Shipping Terminal (MIST) site. The site has access to the Hume Highway/F5 Freeway, which is located approximately 7km away. The links to the highway are predominately via industrial areas and along arterial status roads.

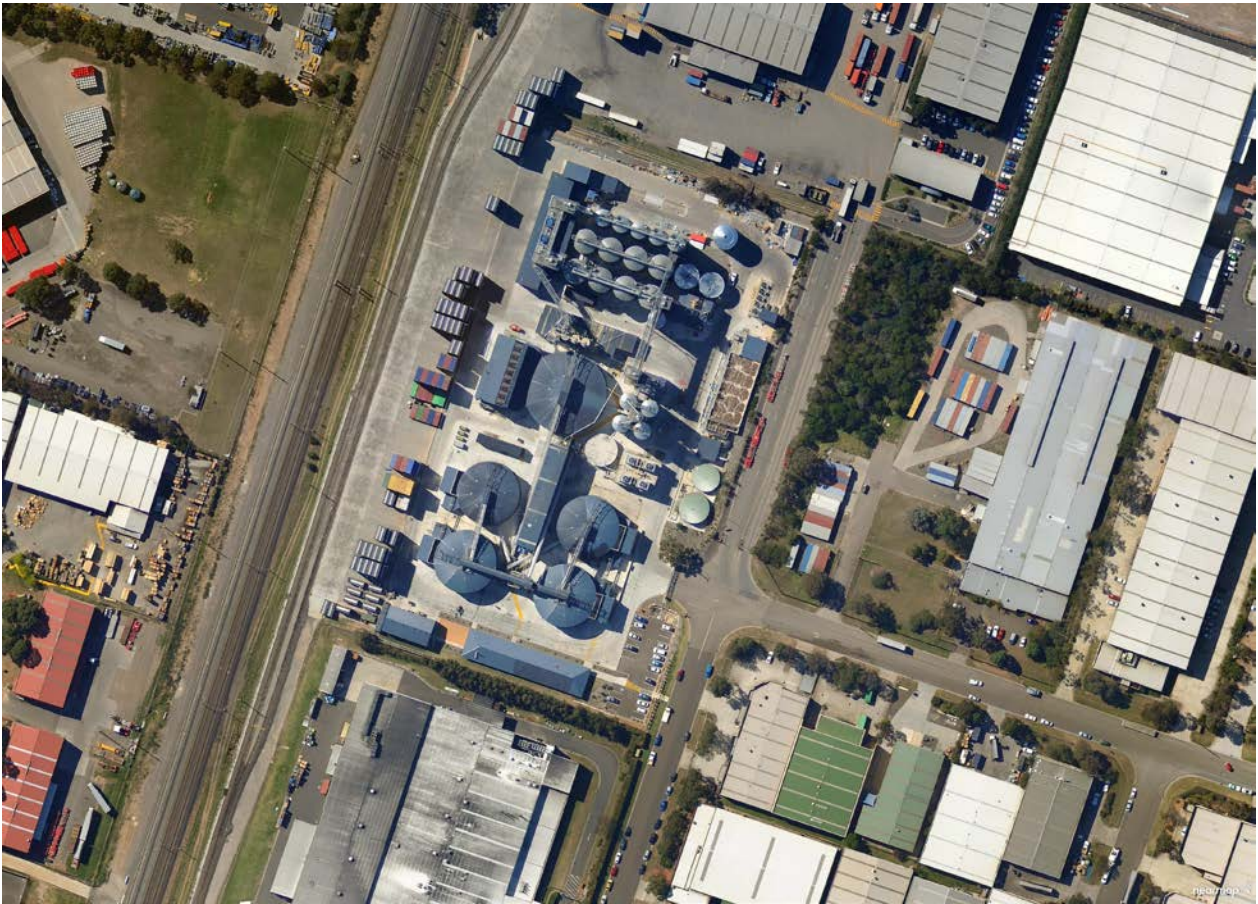


Figure 1: Aerial View of the JWM Minto Site Source: NearMap

The legal description of the site is Lot 201 DP 813362. It was formerly known as the old “Hudson Site”. It is situated within the Minto Industrial Area and is adjoined by industrial uses and the railway line, which runs along the western boundary (refer to **Figure 2**). Immediately adjacent to the site to the north is the Macarthur Intermodal Shipping Terminal (MIST).

The site fronts Stonny Batter Road, which is accessed off Pembroke Road. All access to the site is via secured gates accessed from Stonny Batter Road.



Figure 2: Site in context of surrounding industrial area Source: NearMap

Existing Approvals

- May 2009 The Minister granted Part 3A approval for demolition of existing buildings, and for construction and operation of a malting plant and grain distribution centre (ref: 08_0157)
- April 2012 A Section 75W Modification Application was approved to allow raw and processed product to be transported via road and rail as required rather than just by rail (ref: 08_0157 MOD1)
- June 2014 A Section 75W Modification Application was approved to allow up to an additional 12 silos to be erected on the site (ref: 08_0157 MOD2)

Current Site Development

The site has been developed and is used for the JWM malting manufacturing plant and grain packing facility. The site has been in operation since construction was completed in 2011.

Attached in Attachment B are photos of the existing office building and the area in which the office extension will be constructed.

Existing Site Environment

The existing site comprises a new state of the art malt and grain packing facility. Development on site comprises 4 germination vessels, a kiln, silos, analysis bins, covered automated overhead conveyors, a plant room, a water treatment plant, water tanks, effluent tanks, grain transfer station, ancillary facilities and an administration office, maintenance shed and car park.

The site is accessed via security gates and operates 24 hours a day, 7 days a week throughout the year, although deliveries and dispatch are confined to the hours stipulated in the project approval.

The modern exterior of the industrial development of the site contributes to the positive urban renewal of the Minto industrial area.

Existing Traffic Environment

JWM continues to operate in accordance with the approval commitments to maximise use of the MIST container terminal with the vast majority of deliveries and product dispatch being by rail. The extension of the existing office building to provide improved R+D and training facilities for the existing staff will have little if any impact on traffic movements to or from the site nor will it require changes to the access arrangements. Accordingly it was not considered necessary to undertake a traffic impact assessment.

Traffic associated with construction of the office expansion will be managed in accordance with a Construction Management Plan anticipated to be a condition of this s75w modification application.

Existing Noise Environment

Other than noise which is inevitable during construction and which will be managed in the Construction Management Plan, there will be no additional discernible noise generated by the expanded office. In any event there are existing conditions of approval which would be retained dealing with the maximum noise levels that can be emitted from the site and these would be retained and complied with.

Existing Visual Environment

The existing visual environment is dominated by the JWM silos on site which the existing and proposed single storey office building barely discernible within or external to the site. **Attachment A** contains the modification plans of the proposed development; comprising the site plan and elevations. It can be seen that the new development would be indistinguishable from the existing office development from a visual impact perspective. It is doubtful that it would be visible or distinguishable external to the site including from any residential or recreational areas and in any event it is of a design and scale expected for an office building servicing the adjacent industrial development.

Site Operations

The current malting plant produces up to 130,000 tonnes of malt a year on site as allowed for under the current approval. The existing office provides the administrative support function for the plant. The plant and office accommodation is operating at capacity and operational efficiencies are hampered by a lack of on site R+D and training facilities. This has been exacerbated since the acquisition by Cargill of JWM as Cargill has a focus on quality, R+D and training requirements for its operations. This has led to the need for additional office space as is proposed by this modification application.

The proposed additional office space is not to facilitate increased production or personnel working onsite but is merely intended to allow improved efficiencies in the administrative functions undertaken on site and allow enhanced facilities for staff.

As well as the need for up to 6 contractors required during the office expansion construction stage (estimated to last up to 3 months), there will be the a change to operational staff numbers up by 2 additional, with no changes to hours of operation or production levels as a result of the additional office floorspace. The construction will not impact on existing vehicular access or parking arrangement and the only landscaping of the site to be affected will be the relocation of one small garden bed. The majority of the proposed office expansion will be over existing paved surfaces adjacent to the existing office building (as an extension to it), and not in areas currently landscaped.

The Proposed Development

The existing layout of the site will remain. There will be no demolition of existing development. The proposed office expansion will match, and be an extension to, the existing office building on site.

Specifically, the office expansion proposes an additional 137.3m² of floorspace comprising a 14.5m extension to the width of the existing building and a 9.47m width to match the width of the existing office building. This will increase the size of the office building from 437.04m² to 574.3m². The extension will involve the removal of an existing verandah at the western (or rear) section of the existing office building and its replacement with additional office space.

The existing office building is single storey and of brick construction with a colourbond pitched roof. The extensions will reflect the existing office building in terms of materials of construction, design and form so that it will appear as one (expanded) office building upon completion (refer plans in **Attachment A**). As the works will be to the western part of the building it will not be visible from Stonny Batter Road.

As shown in the figure below, the office extensions will be situated within the existing lot boundary and will not affect access to the site or other operational facilities.



Aerial view of the site with location of proposed office expansion

Source: Nearmap



Location of the proposed office expansion



View of the office expansion site looking south

Source: JWM

JWM Proposed Site Operation

There will be no change to current operation of the malt manufacturing and grain packing facility other than to extend the length of the office building by 14.5m. The proposed development is not intended to increase production but only to provide sufficient space for training to ensure the efficient operation of R+D facilities. Furthermore, there are limited facilities for staff working at the plant to undertake training activities onsite. The proposed expansion of the existing building will address these issues.

Packing Plant

There will be no change to the existing packing plant associated with this proposal.

Automation

There will be no change to the existing automation of the plant associated with this proposal.

Staff

There will be 2 additional staff members added to the current operational staff on site as a result of the proposed expansion. Furthermore, it is estimated that 6 contractors would be employed for up to 3 months to construct the extension.

Hours of Operation

There will be no change to the existing hours of operation associated with this proposal. The plant operates 24 hours per day, 7 days a week and will continue to do so.

Landscaping

There will be no change to the existing landscaping on site, aside from the relocation of one small garden bed. The majority of the office expansion will be built on existing hard stand (paved) areas of the site.

Signage

No additional signage is proposed as part of this proposal.

Structure Construction

The proposed office expansion will adjoin the existing office and will present as an extension of that facility. It will match the existing office building in terms of height, scale and materials of construction.

Alternatives and Justification

Need for the project

The current Minto malting plant office lacks sufficient space to operate efficient R+D and training facilities. The proposed development will not increase the output of the plant but will address the lack of space issues by providing an area dedicated to R+D activities and for training.

Justification for the proposed development

The proposed development is not designed to increase revenue or production but to ensure the current demand is met whilst improved quality testing can be undertaken with product able to be tested on site. By extending the office space of the existing building, plant can ensure top level quality testing of the product and that the latest processing and production techniques are used.

Alternatives to the proposed development

Due to the nature of the facility R+D and training facilities at the site are essential for the plant's operation. The expanded office is required to increase efficiency and ongoing quality testing of product prior to use in and/or dispatch from the plant. There are therefore no feasible alternatives to the proposed development. This is therefore the preferred option.

Consequences of not proceeding

If the extension is not constructed, JWM will continue to meet minimum quality standard requirements. However, the higher quality standard the company is seeking to implement by improving product testing and facilitating more efficient staff training on site would be lost.

Regulatory Framework

This section outlines the current regulatory framework that applies to the JWM proposal and considers policies relevant to the malting plant.

Planning Approach

Assessment of the project in accordance with the provisions of the Environmental Planning & Assessment (EP&A) Act 1979.

The DP+E confirms that an Environmental Assessment (EA) for a section 75W modification of a consent issued under Part 3A of the EP&A Act is required. The Minister will be the consent authority for the proposed development.

Other legislation, guidance and policies are applicable to the JWM expansion proposal based on the nature of the work, environmental factors and geographical location. A discussion of the relevant regulatory framework is below.

Federal Legislation

Environmental Protection and Biodiversity Conservation Act 1999

There are no aspects of the expansion proposal which trigger considerations under this legislation.

NSW Legislation

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) legislates the Town Planning process for all developments in NSW. Where projects are approved by the Minister under Part 3A of the Act, as the JWM facility was, there is a requirement for any modification to that consent under section 75W of the Act, to also be determined by the Minister on advice from the DPI.

The EP&A Act defines numerous objectives. The objectives considered relevant to the original malting plant and packing facility proposal were to encourage:

- The proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment
- The promotion and co-ordination of the orderly and economic use and development of land
- The protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats
- Ecologically sustainable development
- The sharing of the responsibility for environmental planning between the different levels of government in the State.

The malting plant and packaging facility were approved and now operate under these objectives. The proposed office expansion also meets these objectives. It will provide additional space for testing and training facilities to ensure the plant continues to operate efficiently.

State Environmental Planning Policies

The initial proposal was assessed under the State Environmental Planning Policy (Major Projects) 2005 which has since been superseded by the SEPP (Major Developments) 2005.

The plant was declared a major project under the initial legislation. Schedule 1 sub-clause 3. of the Major Projects SEPP identified the following use as a major project:

3 Agricultural produce industries and food and beverage processing

Development that employs 100 or more people or has a capital investment value of more than \$30 million for any of the following purposes:

- (a) *abattoirs or meat packing, boning or products plants; milk or butter factories; fish packing, processing, canning or marketing facilities; animal or pet feed; gelatine plants; tanneries; wool scouring or topping; rendering plants, or*
- (b) *cotton gins; cotton seed mills; sugar mills; sugar refineries; grain mills or silo complexes; edible or essential oils processing; breweries; distilleries; ethanol plants; soft drink manufacture; fruit juice works; canning or bottling works; bakeries; small goods manufacture, **cereal processing** or margarine manufacturing; wineries, or*
- (c) *organic fertiliser plants or composting facilities or works, or*
- (d) *any purpose that the Minister considers constitutes an agricultural produce industry or food and beverage processing.*

(emphasis added)

SEPP 55 – Remediation of Land

Land contamination studies were undertaken with the original EA. There were no records indicating site contamination. No further assessment needs to be undertaken with this Section 75W Application.

Regional Environmental Plans

Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment

This proposed development has no further impact on Regional Environmental Plan (deemed SEPP) than the overall development of the site which was approved in May 2009.

Local Planning Controls

Campbelltown Local Environment Plan 2002

The subject site is zoned 4(a) General Industrial under the Campbelltown (Urban Area) LEP 2002. As this proposal is to be assessed under Part 3A of the EP&A Act compliance with this LEP is not compulsory. However, the assessment below identifies that the proposed development complies with this LEP.

12 Zone 4 (a)—General Industry Zone

(1) What land is within Zone 4 (a)?

Land is within Zone 4 (a) if it is shown coloured mauve on the map.

(2) What are the zone objectives and what effect do they have?

The objectives of this zone are:

- (a) to encourage activities that will contribute to the economic and employment growth of the City of Campbelltown, and
- (b) to allow a range of industrial, storage and allied activities, together with ancillary uses, the opportunity to locate within the City of Campbelltown, and
- (c) to encourage a high quality standard of development which is aesthetically pleasing, functional and relates sympathetically to nearby and adjoining development, and
- (d) to protect the viability of the commercial centres in the City of Campbelltown by limiting commercial activities to those associated with permitted industrial, storage and allied development, and
- (e) to ensure development will not be carried out unless the consent authority is satisfied that the processes to be carried on, the transportation to be involved, or the plant, machinery or materials to be used, do not interfere unreasonably with the amenity of the area.

Except as otherwise provided by this plan, consent must not be granted for development on land within this zone unless the consent authority is of the opinion that carrying out the proposed development would be consistent with one or more of the objectives of this zone.

(3) What development may be carried out without consent?

Development may be carried out on land within this zone without consent for the purpose of:
drainage; forestry; utility installations.

(4) What development may be carried out only with consent?

Development which is not included in subclause (3) or (5) may be carried out with consent on land within this zone.

(5) What development is prohibited?

Development is prohibited on land within this zone if it is for the purpose of:

boarding-houses; bulky goods retailing; caravan parks; commercial premises (other than those associated with, or ancillary to, any other permissible development and located on the same site as that development); dwellings (other than conjoint dwellings); exhibition homes; extractive industries; hazardous industries; hazardous storage establishments; hospitals; institutions; liquor stores; offensive industries; offensive storage establishments; places of assembly; religious establishments (other than those in existing industrial buildings); retail plant nurseries; roadside stalls; shops (other than those primarily intended to serve people employed or occupied in land uses permitted in the industrial zones).

The proposed works are permissible with development consent and are considered an ancillary addition to the original development. The plant will continue to function within the terms of its original approval.

Development Control Plans

The original EA was assessed against the *Campbelltown (Sustainable Cities) DCP 2007* which has now been superseded. *Campbelltown (Sustainable Cities) DCP 2012* now applies to the site.

Campbelltown (Sustainable City) DCP 2012

There are no controls with this DCP which affect the proposed works.

Section 94 and 94A Plans

Section 7.6 contains an assessment of the proposed malting plant and packing facility in terms of Campbelltown City Council Section 94 & 94A Plans.

Consultation

Cardno, on behalf of JWM, has consulted with the following Government bodies prior to the preparation of the EA.

Department of Planning and Environment

Consultation with the DP+E confirmed that the proposed development would need to be approved as a section 75W modification to the original Part 3A approval. No new DGR's are required; however this assessment needs to address the relevant provisions of the DGR's for the original application. If there were determined to be no adverse external impacts, referral would not be required other than to the local Council.

Campbelltown City Council

Due to the nature of the proposed development, a reinspection of the site was deemed not to be necessary. It is expected that the Council will support Cardno's assessment of the site and the office expansion proposed.

Other bodies

Given the benign nature of the storage silos proposed internal to the site, no other referral bodies were identified or consulted.

Community

The proposed development comprises an extension to the office building which will match the existing office building onsite in terms of scale, height, materials and form. It will be located internal to the site. It is unlikely the works will be visible from public vantage points external to the site.

The proposal does not involve any change to the operational capacity of the plant or any increase in the volume of traffic to/from the site. There will be an increase in the number of employees post construction by 2 employees. It will not have any adverse offsite impacts. The office extension is proposed purely to improve the operational efficiency of the plant and allow improvements in the quality testing arrangements of the product it produces and the training of staff working inside.

The site is located more than 400m from any residential properties and is amidst older industrial development. There have been no complaints from the community about its operations since it commenced operations 3 years ago.

For these reasons, and in particular the fact that there are no adverse external impacts associated with the proposal, consultation with the community was not undertaken nor is it considered necessary.

Environmental Risk Assessment

The DGR's for the Environmental Assessment for the original plant required that an environmental risk assessment be undertaken for the project's specific construction and operational risks. Such an assessment was prepared for the total plant including the current office which forms part of the current plant.

The overall risk assessment remains relevant to the operation of the facility. The following risk assessment relates only to the office expansion that is proposed. Accordingly most of the risk items identified for the total plant (i.e. associated with the malt production process itself) are not relevant for the proposed extension.

Risk Categories

The basis for identification of environmental risks is an appreciation of the site location and an understanding of the proposed expansion, which calls for an appropriate construction in terms of scale, height, materials and form as the existing office building.

A risk assessment matrix has not been included due to the minor nature of the proposed development and the minimal risks associated with the works.

Excluded Risk Categories

The risk assessment does not consider the following environmental risk categories which formed part of the risk assessment for the overall plant and therefore would apply to any new development on the site including the expansion but are not directly or specifically relevant to the expansion for the reasons outlined in Table 2:

Table 2 – Excluded Risk Categories

<i>Risk Category Included For Overall Plant</i>	<i>Reason for Not Including in this Assessment</i>
Odour and Air Quality	There will be no odour or air quality issues associated with the expansion.
Water/wastewater	There would be minimal change to water or wastewater usage associated with the office expansion
Flooding	There are no flooding issues associated with the expansion that are not already addressed in the risk assessment for the entire plant
Trade Waste	There will be no trade waste associated with the expanded office building
Heritage	There are no heritage issues associated with the expansion which will be erected over existing hard stand areas developed as part of the new plant
Energy Use	There is minimal additional energy use associated with the expanded office building.
Flora and Fauna	The only impact on flora or fauna is the removal of a small garden bed to allow for space for the office expansion. The garden bed will be moved to another location on the site.
Health	There are no health risks which arise specifically associated with the proposed expansion
Vermin	There are no additional vermin risks which arise specifically associated with the expansion which will be vermin protected to the same degree as the existing building
Fire Hazard	There are no additional fire risks which arise specifically associated with the proposed expansion.
Climatic Conditions	There are no additional climate condition risks which arise specifically associated with the proposed expansion
Natural Hazards	There are no additional natural hazard risks which arise specifically associated with the proposed expansion
Greenhouse Gas Emissions	There will be no extra Greenhouse Gas Emissions generated from the office expansion.

Environmental Risk Assessment Summary

Table 3 overleaf summarises the environmental impacts associated with the office expansion, assigns a risk for each, and provides comments and/or mitigation strategies for each as appropriate.

Table 3 – Environmental Risk Assessment

Environmental Impact	Process/Activity	Potential Impacts from Proposed Office Expansion	Risk	Comments and Mitigation Actions
Traffic and Transport	On site construction traffic	Pedestrian incident associated with construction traffic	LOW	JWM controls all access to and within the site. The location of the expansion will be known to onsite workers A Traffic Management Plan for the construction phase will be prepared and implemented.
	Off site construction traffic	Road traffic incident resulting from changed transport routes	LOW	Detailed and visible signing of road changes and speed limits will be provided when construction is in progress if required.
Noise	Construction of building	Exceedance of acceptable noise limits during construction, particularly at sensitive receivers	LOW	No noise complaints were received or exceedances experienced for the entire plant. Extension of the current office building will have little impact and will comply with noise levels set for the original consent. The nearest residential receiver is 400 m from the site.
	Operation of building	Exceedance of acceptable noise limits during operation, particularly at sensitive receivers	LOW	As was determined for the plant overall, the location of the works and nature of the area diminishes the likelihood of noise levels exceeding DECC guideline.
On-Site Movement	Movement of pedestrians around the site	Worker incident associated with construction	LOW	There are designated pedestrian areas around the plant. “Hi-vis” vests are a requirement for all pedestrian movements around the site. Where the expansion is to be erected in areas currently used by pedestrians, these areas will be cordoned off and developed in accordance with a Construction Management Plan.
Visual Amenity	Construction of building extension	Disturbance to visual amenity during construction	LOW	The expansion will adjoin the existing office building. The industrial nature of the area and distance from sensitive receivers (such as houses) will minimise any impact. Viewing of the expanded office building from public vantage points, including during construction, is considered to be unlikely or indistinguishable from the existing office structure and the plant itself.

Existence of office extension on site	Disturbance to visual amenity from the silo structures	LOW	The expansion is a suitable structure within an industrial area and replicates the existing office building on site. The topography, surrounding buildings and tall trees obstruct views from the majority of residential areas.
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Risk Management for the site

General Site Operations

There will be no changes proposed to the operation of the existing malting plant other than to provide additional space for R+D, a training facility, and to employ 2 additional R+D staff. All impacts associated with the operation of the office building are considered to be low risk.

Management of risk, given what has already been identified and implemented to manage the risk associated with the overall plant and the existing office building, will therefore be confined to the construction phase.

Personnel Safety – Outdoor Operations Areas

All personnel at the site are suitably qualified and safety trained to operate the plant. There will be changes in staffing numbers by an increase of 2. There will be no change to operations of the site associated with the expansion other than providing additional space for training and product testing. As the expansion replicates the existing office building on site, no additional safety training is required.

Environmental Impacts

This section describes the potential environmental impacts identified from the malting plant.

Overview of Environmental Assessment

JWM are an Australian company who have been in operation for 140 years. They have established and operate 8 malting plants in 6 states and have an enviable operational and safety record. They have an ongoing commitment to invest in the latest technologies to ensure their operations are sustainable and efficient. Their extensive experience and industry knowledge demonstrated by their existing operational plants will ensure that environmental impacts are minimised and any issues addressed in the operation of the facility, including for the expansion of the Minto plant office building by 137.3m².

The proposed expansion, as with the existing JWM facility at Minto, will incorporate and maintain appropriate environmental standards and comply with all NSW Government policies and legislation. JWM will continue to conduct all operations in an environmentally sensitive manner in order to protect the environment and to minimise potential impacts upon the community. They will do so under an EPL.

Traffic and Transport

There is considered to be no specific or adverse impact associated with the office expansion on the traffic network or operations. During construction, a Traffic Management Plan will form part of the Construction Management Plan.

Noise and Vibration

There will be no vibration impacts associated with the construction of the office expansion.

The expansion is for increased R+D and training purposes only and there will therefore be minimal, if any, increase in noise associated with the use of the site relative to that currently emitted from the plant. There will be some noise during the construction of the office expansion. However, the nearest sensitive receiver is 400m from the site, there were no noise issues or exceedances during the construction of the overall plant, and the expansion will be erected internal to the site during daylight hours in accordance with the Construction Management Plan.

The office expansion will meet the overall noise emissions permissible from the plant in accordance with the current approval and proponent commitments.

Visual

The proposed office expansion will match the existing office building on site in terms of height, size, scale and appearance.

The site is located in a natural valley. The valley runs north – south with higher land located to the east and west. In the locality of the subject site, the land rises more steeply to the east and slightly drops in height to the west. The low point of the valley is Bow Bowing Creek, which is located approximately 715m west of the subject site. Bow Bowing Creek is approximately 40m AHD, the subject site is approximately 55m AHD and the junction of Stonny Batter Road and Pembroke Road is approximately 75m AHD.

The current and surrounding use of properties is industrial in nature. The proposed expansion will be located adjacent to the existing office and away from site boundaries. It is unlikely that the proposed expansion will be visible from public vantage points external to the site and, if it is viewed, it will be indistinguishable as new development relative to the existing office building on the site.

It is therefore concluded that there will be no adverse visual impact associated with the development.

Other

The following factors were assessed under the original EA and no change will occur as a result of the proposal:

- > External Lighting
- > Signage
- > Landscaping
- > Odour or Air Quality
- > Water/Wastewater Useage
- > Flooding
- > Trade Waste
- > Heritage, flora or fauna
- > Energy Use
- > Health Risks
- > Vermin
- > Fire Hazard
- > Climatic Conditions
- > Natural Hazards

The commitments made and conditions imposed on the development and operation of the overall facility in the original approval will continue to apply notwithstanding the modifications proposed to the site under this Section 75W application.

Development Controls

The proposed office expansion will match the existing office building to maintain the building form and character of the existing development. The amount of car parking spaces will not change from the approved development proposal and remain adequate for workers and visitors with no change to either worker or visitor numbers expected post construction as a result of the expansion.

There will be minimal change to landscaping at the site as the proposed expansion will be primarily constructed on existing hard surfaces and will immediately adjoin the existing office building which is of a similar appearance, height, scale and structure.

Developer Contributions

As the proposed office expansion will not have any impact on the production levels or operational workforce associated with the existing plant, no additional developer contributions to those paid upon approval of the original plant in 2009 are considered warranted or appropriate.

Cumulative Impacts

The definition of a cumulative assessment can be:

“The cumulative impacts on the environment both direct and indirect, which result from the development and operation of the proposed silos, added to other past, present and reasonably foreseeable future development proposals and activities in the region affected by the proposed development.”

Cumulative impacts relate to compounding effects and interactions arising from developments proposed or under implementation within the locality or at a similar time which together impact on the natural or built environment. This ensures consideration of environmental impacts from JWM is not isolated from surrounding developments.

The original EA concluded that there were no significant detrimental impacts from the malting plant and grain packing facility. The proposed works are not affecting the output volumes or production processes associated with the plant and are proposed for administrative efficiency purposes. Therefore the proposed development is not considered to have any adverse cumulative impact on the site itself or on its surrounds.

Secondary Environmental Impacts

Utilities

Electricity, gas and water supply will not be affected by the proposed development except to the extent required to service the expanded office building.

Vermin

The presence of feral animals onsite is undesirable due to health and safety requirements. Feral animals, such as the Black Rat (*Rattus rattus*) and the House Mouse (*Mus domenicus*) are potential feeders of spilled barley grain. Rats are capable of transmitting the diseases leptospirosis and Salmonellosis to humans (Wilson et al, 1992). Pigeons are also possible site pests, which again feed on spilled grain.

As with the entire plant as it currently exists, JWM will ensure the maintenance of strict health standards. In the event of any vermin being located onsite, appropriate control measures are in place.

As an export facility, the plant complies with Australian Quarantine Inspection Service (AQIS) standards. These require a higher level of hygiene and monitoring than domestic based industries. The same requirements will equally apply to the expansion.

Fire

The fire risks and protocols were assessed under the original EA. The current operation complies with industry standards as will the additional silos.

Extensive interlocks are provided between motors, switchboards and conveying or elevating systems, with shut down and alarm default settings. A full fire control panel for both the JWM & PGS facilities links to appropriate fire stations and completes the fire prevention and control system. The office expansion will be integrated into this system.

All site personnel complete full fire response training, with Fire Wardens trained and appointed. Fire safety equipment is also in place around the plant as required by the fire authorities.

Heritage (European and Aboriginal)

Other than in the landscaped areas, the site is entirely developed with buildings, structures or hard surface areas. Issues of heritage values were assessed prior to the site being approved for development of the existing JWM plant. Campbelltown City Council has confirmed that the land is not within a designated Conservation Area and there are no items of environmental heritage recorded for the site.

Ecological Sustainable Development

Ecologically Sustainable Development is founded upon four basic principles to ensure that proposed developments minimise their ecological footprints. These are:

- The precautionary principle
- Inter-generational equality
- Conservation of biological diversity and ecological integrity
- Improved valuation, pricing, and incentive mechanisms in relation to environmental factors.

The JWM malting plant and grain packing facility continues to meet these four guiding principles through ongoing operations. The proposed office expansion will also meet these principles.

Demolition and Construction Management

The western wall of the existing office building will need to be demolished in order to facilitate the proposed extension. This will be managed in accordance with standard demolition regulations and practices.

A Construction Management Plan (CMP) will be prepared for the expansion which will be constructible as a single stage. The CMP will include a Traffic Management Plan to offset any impact on the local traffic network as construction supplies are delivered.

The CMP will also meet the following relevant commitments contained within the approved Environmental Management Plan for the existing plant:

- Noise – no works outside 7am to 5pm Monday to Saturday.

The noise assessment for the original plant identified that the construction of the office extension is unlikely to have any significant impact on the surrounding area.

Statement of Commitments

This sections sets out commitments that JWM and Cargill will abide by upon approval of this Section 75W Modification Application.

The ongoing operation of the malting plant and grain packing facility will remain as approved and the office expansion will be integrated into this operation. This assessment proposes no changes to the current commitments other than to reiterate those of particular relevance to the new expansion and/or to add additional commitments as outlined in **Table 4** below.

Environmental risk mitigation measures will continue to be enforced to guarantee safety and compliance in accordance with the original EA.

Table 4 – Commitments

Objective	Commitment
Construction Works	
• Safe working environment. • Minimise environmental impact.	• Construction Management Plan to be prepared for the works and submitted with the Construction Certificate. • Compliance with the existing Environmental Management Plan and EPL for the Minto site including provisions relating to construction works. • All works conducted in accordance with relevant construction legislation.
Operation of Silos	
• Safe working environment.	• Site specific and job specific OH&S training for all staff. • Provision of information regarding safe working practices for the development. • Identification of pedestrian walkways around silos in locations where dangers may be present. • Separation, where possible, of pedestrians and vehicles. • Requirement for appropriate personal protective equipment to be worn onsite. • Appropriate number of staff to receive first aid training.
Noise Management	
• Responsible management of JWM construction noise. • Responsible management of JWM site operational noise.	• Care taken to avoid excessive noise during construction. • Demolition and construction works only between 7am – 5pm Monday to Saturday. • Ensure maintenance of equipment to limit noise emissions. • Repair of any equipment that fails and results in excessive noise emissions without undue delay.
Visual	
• Minimise visual impacts from site.	• Use of galvanised silos to reduce light reflection.
Environmental Monitoring	
• To ensure compliance with any Environmental Protection Licence (EPL) issued for the malting plant and packing facility.	• Ongoing implementation of the site's Environmental Management Plan which documents environmental monitoring in accordance with the EPL. Modifications to the EMP and EPL are not anticipated to be required to incorporate the office expansion
Landscaping	
• Minimise any adverse visual impact of the JWM operations on surrounding community.	• One garden bed is required to be removed as a consequence of the construction and will be relocated to another part of the premises. • No visual impacts external to the site are expected.

Conclusion

Joe White Maltings (JWM) will continue the successful operation of the Minto plant and propose to enhance this by the provision of a 137.2 square metre expansion to the current office building.

The development represents an opportunity to increase the R+D and training facilities at the site to allow a more efficient operation and to enhance product quality. The proposed development will not increase output of the malting plant which will continue to operate in accordance with the consent conditions of the original approval. It will however assist JWM in achieving more efficient product testing and staff training.

The JWM malting plant at Minto continues to add value to the NSW agricultural industry and the proposed expansion will assist in ensuring a quality downstream product (malt) from NSW agricultural produce (barley).

The malting plant and grain packing facility will continue to operate in accordance with the current approval under Part 3A and approved modifications. No changes to the conditions of consent are sought except as may be required to reflect the proposed office expansion.

In summary, the project involves the construction of an extra 137 square metres of office space which will adjoin the currently existing office building.

There will be a change to the operational workforce by 2 additional staff and up to 6 contractor jobs will be created during the construction phase expected to last 3 months.

This assessment concludes that there are no adverse environmental impacts associated with the expansion of the existing facility in the manner proposed.

STATEMENT OF CERTIFICATION

Environmental Assessment prepared under Section 75w of the Environmental Planning and Assessment Act 1979

Environmental Assessment Prepared by:

Name: Jenny Smithson
Company: Cardno Pty Ltd
Position: Principal Planner (Project Director)
Qualifications: BA (WAIT), Masters TCP (Syd)
Address: C/- Cardno
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203 Pacific Highway
ST LEONARDS NSW 2065

Project to which the Environmental Assessment relates:

Project Description:	Proposed expansion to malting plant to add office building extension, Lot 201 DP 813362, Stonny Batter Road, Minto.
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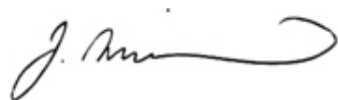
Applicant's Name: Joe White Maltings Pty. Ltd.
Applicant's Address: 124 – 130 South Terrace
ADELAIDE SA 5000

Certification:

I certify that I have prepared this Environmental Assessment and to the best of my knowledge:

- It has been prepared in accordance with the EP&A Act 1979 and the Regulations
- It has been prepared in accordance with the relevant Director General Requirements for the original development dated 15 August 2008
- It does not contain information that is either false or misleading.

Signature:



Date: 19 May, 2015

Attachment A – Plans

Attachment B – Site Photos



View of the office expansion site looking south



View of the office expansion site looking east



View of the office expansion site looking east



View of the office expansion site looking south-east