9 July 2010

The Director General
Department of Planning
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Chris Ritchie

Dear Chris,

M7 Industrial Estate, Roussell Road, Eastern Creek, Blacktown; Project Description Report

1.0 INTRODUCTION

Coca-Cola Amatil Limited (CCA) currently operates a distribution facility at Roussell Road Eastern Creek (CCA Distribution Centre). On behalf of CCA, Goodman Limited (Goodman) is proposing to develop a vacant part of the site upon which the existing CCA Distribution Centre is situated for the purposes of a PET Pre-forms/Closures (plastics) manufacturing plant.

The CCA Distribution Centre is located on land which forms part of the larger M7 Industrial Estate, (See Figure 1).

This Project Description Report has been prepared by Goodman to assist the Department of Planning's initial consideration of the proposal under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

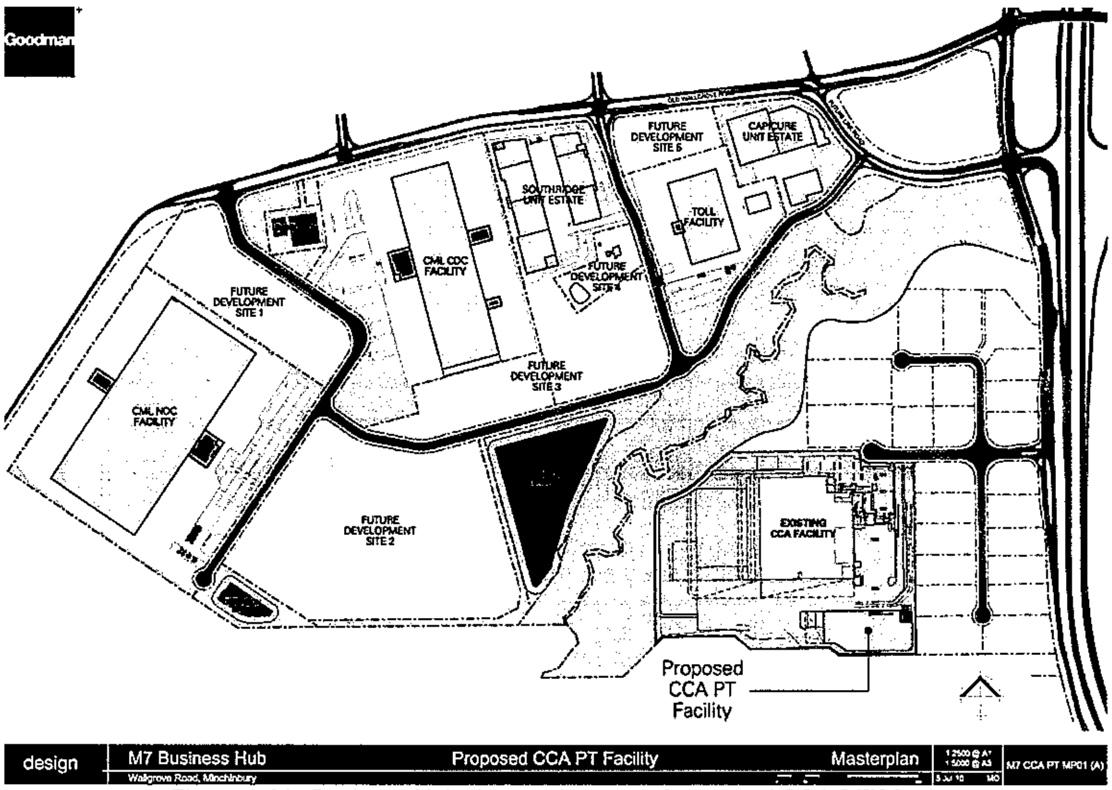

Figure 1: M7 Business Hub showing location of proposed CCA PET facility

2.0 BACKGROUND

The CCA Distribution Centre is situated on land identified as Lot 251, DP 1082988 and is located at Roussell Road Eastern Creek, (the CCA Site). An aerial photograph of the site is located in Figure 2.

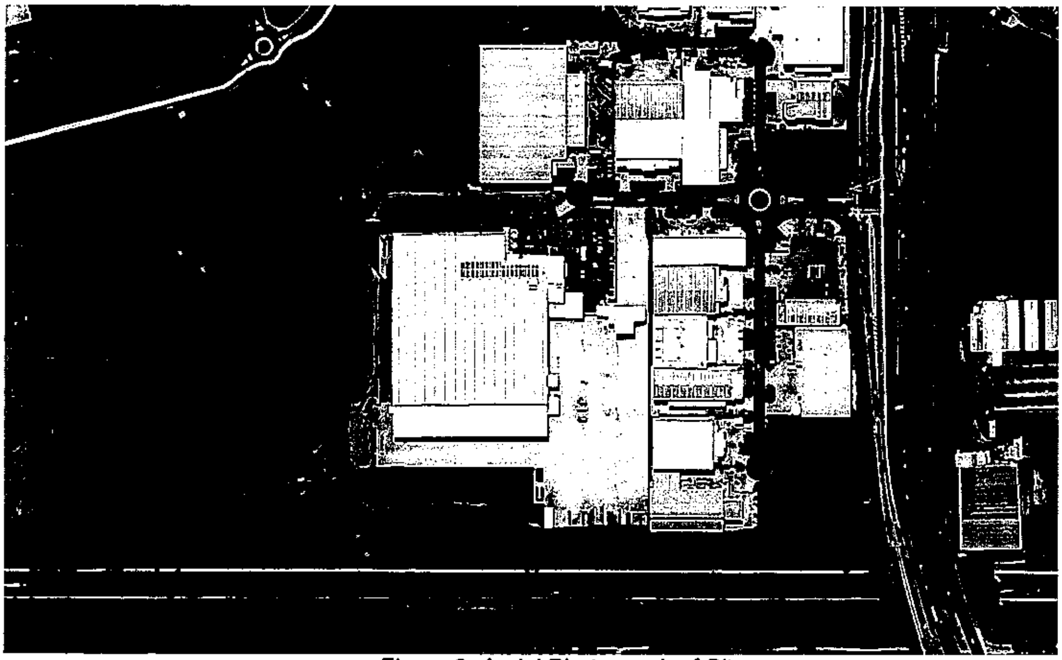

Figure 2: Aerial Photograph of Site

On 10 August 2005, the Minister for Planning granted approval for the construction and operation of the CCA Distribution Facility (DA-308-12-2004-i). The approval was the subject of several subsequent modifications. That development has now been constructed and has been in operation since April 2009.

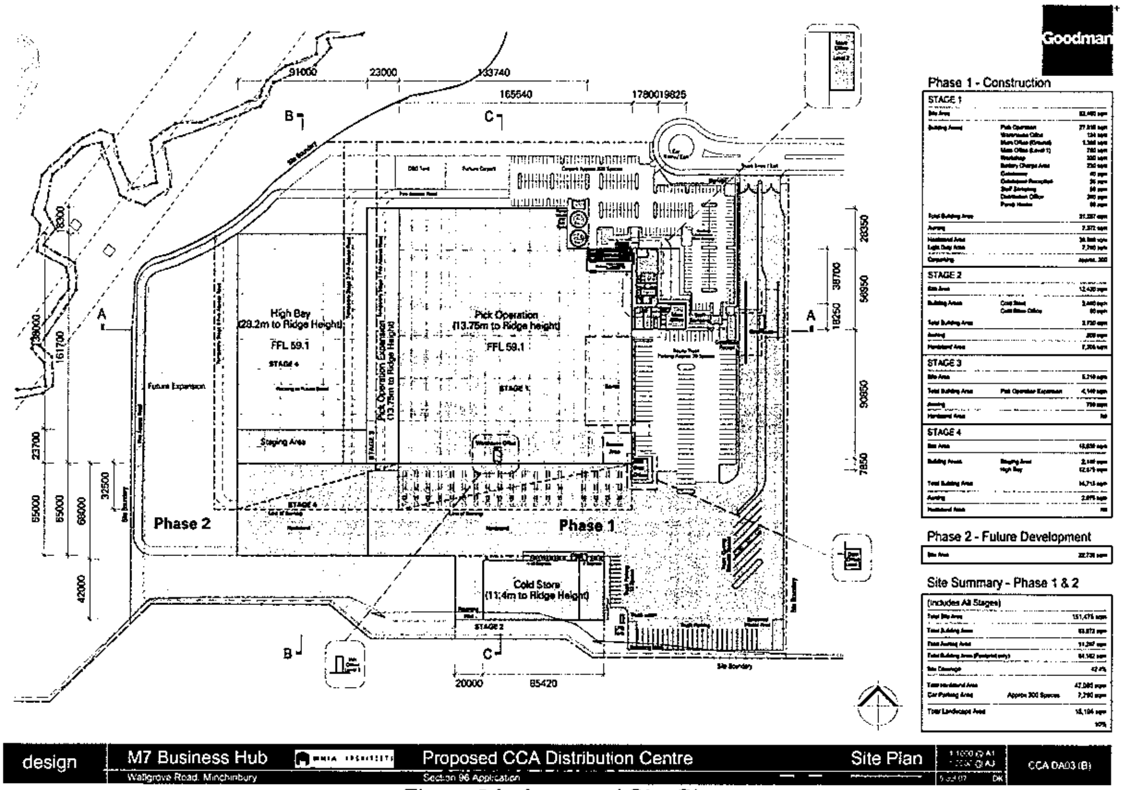

Figure 2A: Approved Site Plan

On 31 August 2009, the site was gazetted as a SEPP (Western Sydney Employment Hub) and rezoned as IN1 General Industrial, the objectives of which are to promote employment generating uses.

As part of the original approval, consent to erect a separate cold storage facility of approximately 3,730m2 was granted. A copy of the approved plan is at Figure 2A above. That part of the approval was never acted upon. However, at this time it is not intended to locate the cold storage facility in the previously identified location. Instead, CCA management has determined that it is more desirable to use the area previously earmarked for cold storage as the site of a new PET Pre-forms/closures manufacturing facility.

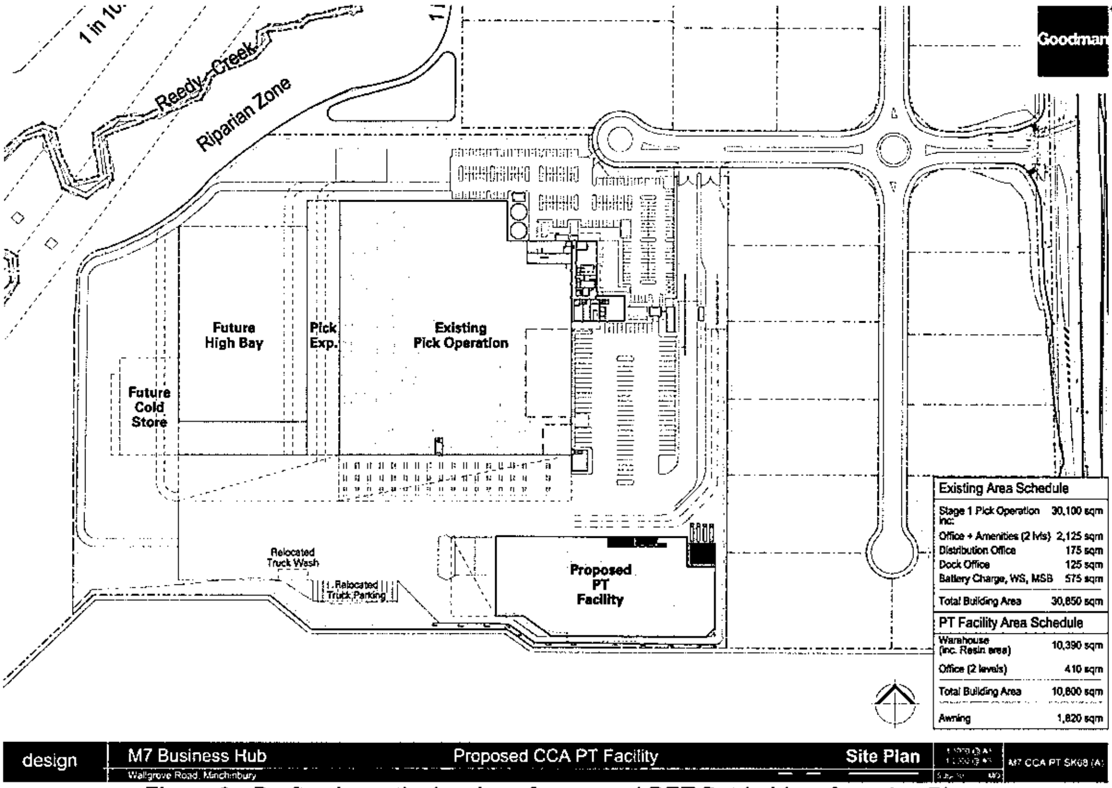

Figure 3: Draft schematic drawing of proposed PET Bottle Manufacturing Plant

3.0 PROJECT OBJECTIVE

The objective of the project is to obtain planning permission for the construction and operation of a 10,800m2 manufacturing plant co-located on the CCA Site adjacent to the CCA Distribution Centre.

The purpose of the proposed new facility is to produce the plastic bottles and caps used for packaging CCA manufactured drinks. The actual packaging of the drinks will be carried out at other existing locations including factories in Australia, New Zealand, Fiji and PNG.

4.0 INTEGRATION

The new manufacturing plant will require shared access and egress and consequently the on site movement of trucks and vehicles (and parking) will need to be considered with some minor reconfiguration for parking of the trucks used in the CCA Distribution Centre activities (approved in the original consent). Modification of the original consent will technically be required as part of the approval of the PET manufacturing plant.

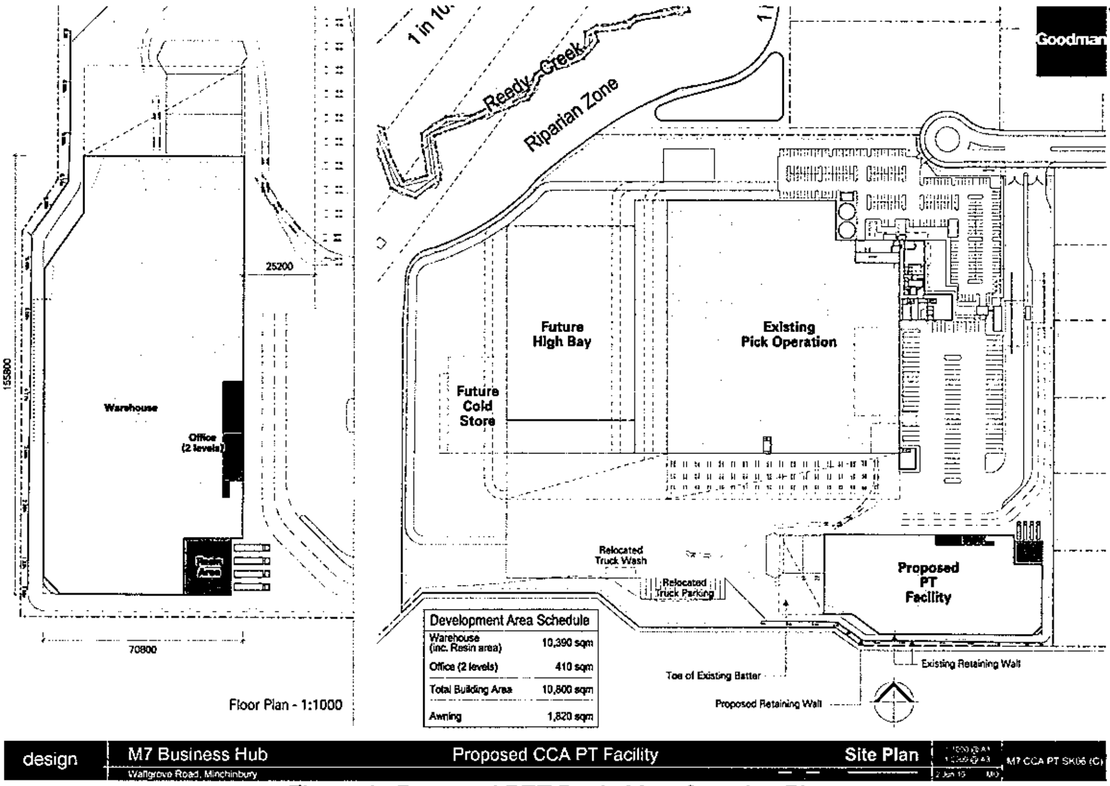

Figure 4: Proposed PET Bottle Manufacturing Plant

5.0 PROPOSED PROJECT

Goodman is currently preparing a project application for the construction and use of the CCA Site for an additional 10,800 sqm manufacturing plant. This package is to include the following:

- minor earthworks and site preparation works;
- construction of the base building, being initially a 7500 sqm warehouse (with approval to expand to 10,000m2);
- fit-out of manufacturing plant and equipment for use as a manufacturing facility;
- minor landscape works;
- reconfiguration of internal shared access;
- Augmentation of power services to the site to enable the manufacturing plant to operate.

The project has a total capital investment value of over $50 million and therefore satisfies Clause 10 of Schedule 1 of the SEPP (Major Projects) by being development for the purposes of manufacturing facilities with a capital investment value in excess of $30 million.

A summary of the project is included in Table 1 below:

Table 1: Proposed Project Summary: Stage 1 - Infrastructure

Project Summary	**Development of infrastructure and associated works to service the estate**
Earthworks:	Minor demolition of existing slabs, minor earthworks to prepare the site for construction, earthworks to create retaining wall and batter
Capital Investment Value:	In excess of $50 million comprising $8m of construction costs and approximately $47.5m of fit-out of plant and equipment
Internal Road works:	Reconfiguration of internal hardstand and circulation paths, and truck parking
Infrastructure (General):	Development of all infrastructure required to service the development
Potable Water:	Servicing of the CCA PET Manufacturing Plant by connection to existing services
Sewer:	Servicing of the CCA PET Manufacturing Plant by connection to existing services
Stormwater Management:	Servicing of the CCA PET Manufacturing Plant by connection to existing services
Electricity, Gas and Telecommunications:	Servicing of the CCA PET Manufacturing Plant by augmentation of existing power services
Other Estate Works	Estate landscaping and vegetation as required

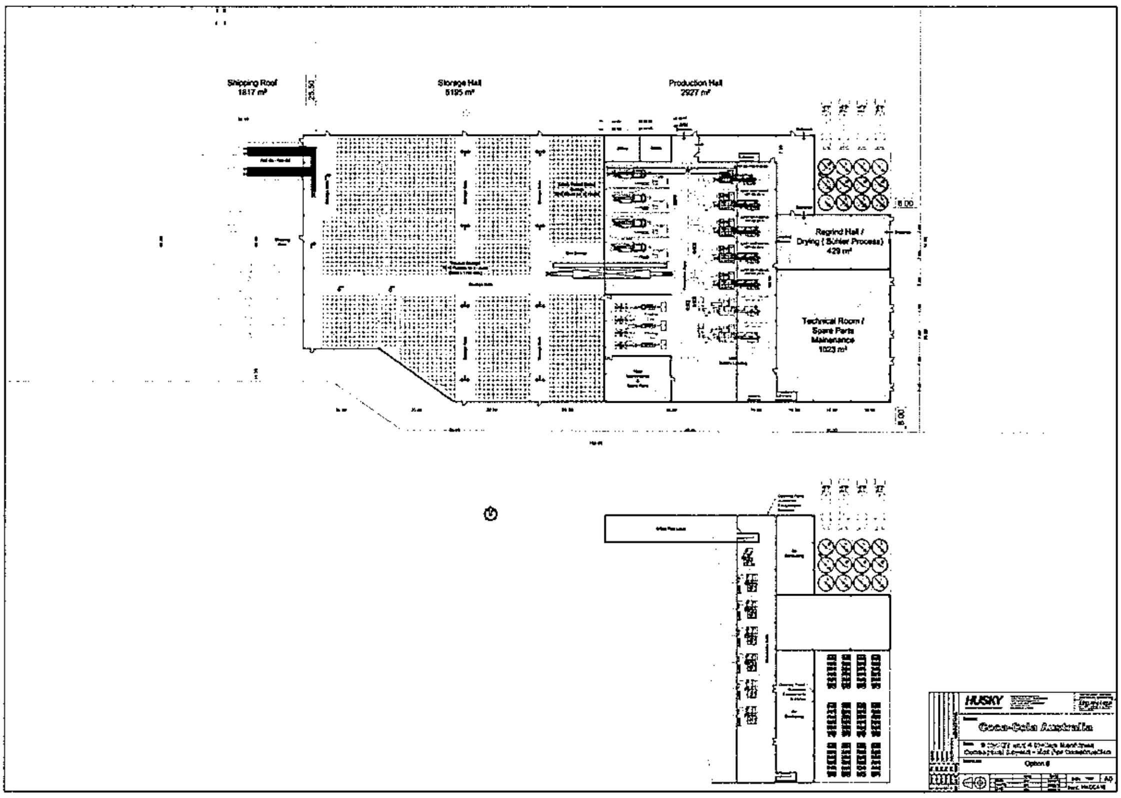

Figure 5: Preliminary Schematic Layout

6.0 MANUFACTURING ACTIVITIES

The manufacturing process at the proposed facility entails conversion of Polyethylene Terephthalate (PET) and High Density Polyethlene (HDPE) resin pellets to Preforms and Closures respectively. The PET perform process entails vacuum conveying of PET resin pellets from a bulk silo to a hot air desiccant dryer to remove the moisture from the resin and then the dry pellets are injection moulded on multi-cavity injection moulding machines to produce finished performs.

The Closure manufacturing process entails vacuum conveying of HDPE resin pellets from a bulk silo to the multi-cavity injection moulding machines which produce the finished closures. The closures are then painted with the designated product designs relevant to the ultimate product that they will be applied to.

The process will be a 24 hour/seven days a week operation.

The finished products are then stored in high cleanliness bulk containers within the warehouse pending distribution to the CCA Blowfill Bottling Operations both within Australia and south pacific region.

There is some minor production of waste and by-product representing 0.1% of the total inputs to production which is sold to plastic recyclers.

There is a requirement for a small (200sqm) hazardous materials storage area.

The design, construction, operation and maintenance of the finished PET manufacturing plant will not be a hazardous industry as the emissions from the process are not such that there is not any significant environmental issue.

7.0 CONSULTATION

Agencies and other key stakeholders that may have an interest in the proposal and would be consulted during the application process include:

- Blacktown Council;
- Roads and Traffic Authority (RTA);
- Sydney Water;
- Integral Energy
- Department of Water and Energy (DWE)

As the development is within an existing developed site and having regard to the relative and actual impacts, it is not anticipated that any other agency approvals will be required.

7.0 STATUTORY CONTEXT

Major Project

The proposal is classified as a major project under Part 3A of the Environmental Planning and Assessment Act 1979 (EP&A Act), because it involves development for the purpose of manufacturing facilities, with a capital investment value of more than $30 million and therefore triggers the criteria in Clause 10 of Schedule 1 of *State Environmental Planning Policy (Major Projects) 2005.*

Consequently, the Minister for Planning is the appropriate approval authority for the project.

Permissibility

The land is, pursuant to SEPP (WSEH) zoned IN1 General Industrial. The objectives of this zone are as follows:

Clause 11 – General Industrial IN1 Objectives:

- *To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space.*
- *To encourage employment opportunities along motorway corridors, including the M7 and M4.*
- *To minimise any adverse effect of industry on other land uses.*
- *To facilitate road network links to the M7 and M4 Motorways.*
- *To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment.*
- *To provide for small-scale local services such as commercial, retail and community facilities (including child care facilities) that service or support the needs of employment-generating uses in the zone.*

Permissible Uses:

Depots; Food and drink premises; Freight transport facilities; Industrial retail outlets; ***Industries*** *(other than offensive or hazardous industries); Neighbourhood shops; Roads; Service stations; Transport depots; Truck depots; Warehouse or distribution centres.*

Accordingly, the proposal, being development for the purpose of manufacturing facility, is currently permissible under the SEPP (WSEH) as it permits development for this purpose with consent.

Other Environmental Planning Instruments

The following environmental planning instruments are of relevance:

- *SEPP (Major Projects) 2005;*
- *State Environmental Planning Policy (SEPP) – Infrastructure;*
- *SEPP 55 – Remediation of Land;*
- *Draft SEPP 66 – Integration of Land Use and Transport;*
- *Blacktown Local Environmental Plan 1998; and*
- *Employment Lands Precinct Plan - Eastern Creek Precinct.*

6.0 ENVIRONMENTAL ISSUES

Goodman is currently undertaking an environmental assessment of the land the subject of the proposed project application. A brief summary of the scope of this environmental assessment is provided in the following table to identify the key environmental issues for further assessment and to assist in the preparation of the Director-General's environmental assessment requirements for the project.

Table 2: Environmental Assessment Summary

Soil & Water:	*Geology and Soils:* • Assessment indicates no major geological or hydro-geological constraints to development of the site • An Erosion and Sediment Control plan will be prepared for the proposal. *Site Contamination:* • The site is not contaminated. *Salinity:* • As the site is predominantly developed and there is only minor earthworks and demolition of exiting concrete hard-stand the potential for salinity impacts is deemed to be low. This will be addressed in the soil and water management report. *Riparian Areas / Waterbodies:* • The proposed development is a significant distance from the nearest tributary or waterway or riparian zone and so the likelihood of impact on the riparian zone or tributaries is remote. *Flooding:* • The CCA Site is almost completely developed and the proposed additional development will be at the same relative levels of the existing development and accordingly there is not likely to be any additional impact of flood levels or flood storage capacity within the catchment. *Drainage / Stormwater Management:* • Stormwater will be managed by connection of the proposed development to the existing stormwater management system as anticipated by the original approval DA-308-12-2004-i in order to ensure that the development does not result in any net impact on the water quality or quantity of Eastern Creek • A stormwater management plan will be prepared in accordance with the original stormwater concept.
Noise:	• The site is located adjacent to an existing industrial area. There are no identifiable sensitive receivers of noise and as such no likely impact. • A Noise Impact Assessment will be carried out to ensure that the development will not result in a significant noise impact to surrounding land users
Air Quality:	• The proposal is not expected to generate significant air emissions – dust emissions during construction works are to be managed by the adoption of standard best practice dust management measures. • Air emissions during operations will be mitigated in the manufacturing process.
Flora and Fauna:	• The CCA Site is predominantly developed and the proposed new development does not anticipate destruction of any flora or fauna. • There are some relatively minor earthworks required to create a retaining wall which will require the clearing and excavation of virgin land, but the flora and fauna issues were considered as part of the approval of the development of the existing CCA Site.
Indigenous Heritage:	• The CCA Site is fully developed and as a consequence the construction of the proposed new CCA PET Manufacturing Plant is not considered likely to create any need to consider indigenous heritage
Historical Heritage:	• The CCA Site is fully developed and as a consequence the construction of the proposed new CCA PET Manufacturing Plant is not considered likely to create any need to consider European heritage.
Traffic & Transport:	• A traffic impact assessment of the proposed development and comparison with the previously approved CCA Distribution Centre will be undertaken including updating traffic counts at key intersections as well as an assessment

	of the proposed development with reference to intersection performance, internal access, car parking requirements and anticipated construction traffic. • The provision of car parking on site is generally in excess of code requirements and therefore the provision of car parking on site would be in accordance with code requirements once the PET facility was completed. This level of car parking is adequate for the proposed number of staff.
Visual Amenity:	• The CCA Site is fully developed and as a consequence the construction of the proposed new CCA PET Manufacturing Plant is not considered likely to create any issues with respect to visual amenity
Hazards:	• The proposal requires the need for a small area designated for the storage of hazardous goods used in the manufacturing process
Construction Management	• A Construction Environmental Management Plan for the construction phase of the development to manage the environmental impacts associated with noise, traffic, waste, erosion and sedimentation control would be submitted prior to construction.

7.0 CONCLUSION

Goodman trusts that the information contained in this Project Description Report provides the Department of Planning sufficient information to enable its initial consideration of the proposed ***CCA PET MANUFACTURING FACILITY*** under Part 3A of the EP&A Act. In this regard, Goodman requests that the Department:

- Seek the opinion of the Minister for Planning that the ***CCA PET MANUFACTURING FACILITY:*** is a project to which Part 3A of the EP&A Act applies; and
- Issue Director-General's environmental assessment requirements for the Major Project application under Section 75F of the EP&A Act respectively.

Should you require any further information, please do not hesitate to contact the undersigned on (02) 9230 7297.

Yours faithfully,

Will Dwyer
National Planning Manager