Tract

Environmental Assessment
Application Number MP 10_0125
Part 3A *Environmental Planning and Assessment Act 1979*

Coca-Cola Amatil

Plastics Manufacturing Facility
(Preforms and Closures for Blow-fill Bottling Operations)

9 Roussell Road
Eastern Creek

M7 Industrial Estate
Blacktown Local Government Area

Prepared by
Tract Consultants Pty Ltd

On Behalf of
Goodman Property Services (Aust) Pty Ltd

2 December 2010

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Author's Statement

In accordance with the Director-General's Requirements for Application Number MP 10_0125, and as the principal author of this Environmental Assessment Report, I hereby certify that the information contained herein is neither false nor misleading.

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Executive Summary

This Environmental Assessment report has been prepared by Tract Consultants Pty Ltd on behalf of Goodman Property Services (Aust) Pty Ltd.

It accompanies a Goodman Property Services (Aust) Pty Ltd application (Application Number MP 10_0125) made under Part 3A of the *Environmental Planning and Assessment Act 1979*.

The application relates to the further development of the Coca-Cola Amatil Limited (CCA) distribution centre site within the M7 Industrial Estate in the Blacktown local government area.

Development and use of the land comprising the estate and of the subject site, has proceeded / is proceeding generally in accordance with the original approval (Reference Number: DA-308-12-2004-i) as modified.

The proposed development primarily comprises:

– Construction of a c.11,000m^2 industrial building in two stages to house a plastics manufacturing process and associated activities including product storage; and

– Fit-out of manufacturing plant and associated equipment for use as a manufacturing facility.

The proposed plastics manufacturing facility will produce "preforms" and "closures" associated with CCA's in-house blow-fill bottling operations in Australia, New Zealand, Fiji and Papua New Guinea.

The development is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979*, in part because it has a "capital investment value" in excess of $20 million, comprising construction costs of about $8 million and fit-out costs of about $47.5 million.

The proposed manufacturing facility has been designed to integrate with existing and proposed future distribution centre operations.

As such, it will have minimal impact on those operations.

Equally, the modifications required to allow the integration will have little if any additional impact beyond the boundaries of the site, as they effectively constitute a re-organisation of existing / approved distribution centre components.

The scope of potential environmental impacts associated with the proposed manufacturing facility is minimised by virtue of the site and development location attributes, the extent and nature of existing and approved development, and the nature of the proposed manufacturing process and the related hazards and emissions profile.

In this context, relevant assessments have identified that the proposed development will have only minor, if any, impacts beyond the boundaries of the site.

The project also has broader sustainability, including environmental, benefits when considered in association with CCA's move to in-house blow-fill bottle manufacture.

These benefits include reductions in raw material requirements, energy requirements per unit and associated transportation requirements.

In addition, the proposed development is generally consistent with NSW government and Blacktown Council intentions for the Western Sydney Employment Area / Eastern Creek Precinct Plan area.

The accompanying application is therefore recommended for approval as part of the further staged development of CCA's Eastern Creek distribution centre site.

1 Introduction

1.1 Overview

This Environmental Assessment report has been prepared by Tract Consultants Pty Ltd on behalf of Goodman Property Services (Aust) Pty Ltd.

It accompanies a Goodman Property Services (Aust) Pty Ltd application (Application Number MP 10_0125) made under Part 3A of the *Environmental Planning and Assessment Act 1979*.

The application relates to the further development of the Coca-Cola Amatil Limited (CCA) distribution centre site within the M7 Industrial Estate in the Blacktown local government area.

1.2 Site Details

The CCA distribution centre site is located at 9 Roussell Road, Eastern Creek.

The site is described as Lot 251 on DP1082988 and contains an area of about 15 hectares.

The approximate boundaries of the site are highlighted in red on the aerial photograph below.

The existing level of site development is also shown on the photograph.

Development of the subject site is bound by provisions within State Environmental Planning Policy (Western Sydney Employment Area) 2009 (the WSEA Policy).

For the purposes of the WSEA Policy, the subject site is included within the "General Industrial" zone.

Provisions within the Eastern Creek Precinct Plan are also relevant.

The site is included within the Eastern Creek Precinct Plan Stage 3 Release Area.

1.3 Adjoining / Surrounding Development

Historically, the subject site and surrounding lands had been extensively modified by agricultural and quarrying activities.

Land generally to the north-east and east of the subject site is now almost fully developed for industrial and other related purposes as part of the M7 industrial estate.

Lots fronting Shale Place (south of Roussell Road) are developed with industrial buildings which back on to the eastern boundary of the subject site.

A corridor of land to the south of the subject site / industrial estate is used for the Sydney Water Pipeline.

Land generally to the west and north-west of the subject site has been retained and enhanced as a riparian zone along Reedy Creek.

Overhead high voltage power lines and associated towers extend along the riparian zone.

The nearest residence is approximately 500 metres to the south of the site.

1.4 Previous Approvals

The Minister for Infrastructure and Planning approved development of land including the subject site at Wallgrove Road, Minchinbury, subject to conditions, on 30 June 2005.

The original "M7 Business Hub" proposal was classified as State significant development under Section 76A(7)(a) of the *Environmental Planning and Assessment Act 1979*.

The approval was subsequently granted under State Environmental Planning Policy No. 34 – Major Employment Generating Industrial Development.

The approval (Reference Number: DA-308-12-2004-i) provides for:

> *Construction and operation of a distribution centre for Coca Cola Amatil, subdivision of the site including provisions for utilities, construction of roads and stormwater infrastructure, and creation of a riparian corridor.*

Development and use of the land and of the subject site has proceeded / is proceeding generally in accordance with the original approval as modified (refer Estate Masterplan figure above).

Relevant modification references are: MOD-179-11-2005-I; MOD-44-4-2006-I; MOD-63-7-2007; DA-308-12-2004-i-MOD 4; DA-308-12-2004-i-MOD 5; and DA-308-12-2004-i-MOD 6.

A Developer Agreement (dated 23 June 2005) exists with respect to obligations for the development of the industrial estate.

1.5 Site Development

The subject site was created as part of the development of the M7 Business Hub / Industrial Estate, as described above.

The site is being developed in stages as a distribution centre for CCA.

Stage 1 distribution centre operations commenced on the site in April 2009.

The distribution centre operates 24 hours per day, 7 days per week.

The distribution centre was awarded the 2009 Manufacturing Logistics and Storage Award by the Supply Chain and Logistics Association of Australia in recognition of the high degree of efficiency and innovation within the facility.

Example photographs of existing distribution centre buildings (taken from the entry car park)

The existing distribution centre buildings contain an area of approximately 31,000 m^2 and extend to a height of 13.75 metres above the finished floor level.

Stage 1 finishes, including the architectural design of buildings and associated structures, are of a high standard befitting CCA's international reputation.

In this context, the distribution centre won the Urban Taskforce Australia's 2009 Development Excellence Award.

The judges commented that the building design presented a modern form shaped to portray a 21st century business.

Further stages of development, as shown on the approved plans (refer Appendix 2 – Drawing No DA01/B), include a High Bay warehouse area which will extend to a height of about 28.2 metres above the finished floor level.

The intention is that further development of the site will occur over time as CCA requirements dictate and in accordance with necessary / subsequent approvals.

Approved modifications (refer MOD-63-7-2007) to the development consent included construction and operation of a new cold storage facility about mid-way along the southern boundary of the site.

The proposed cold store building has a gross floor area of 3,730m^2 and extends to a height of 11.4 metres.

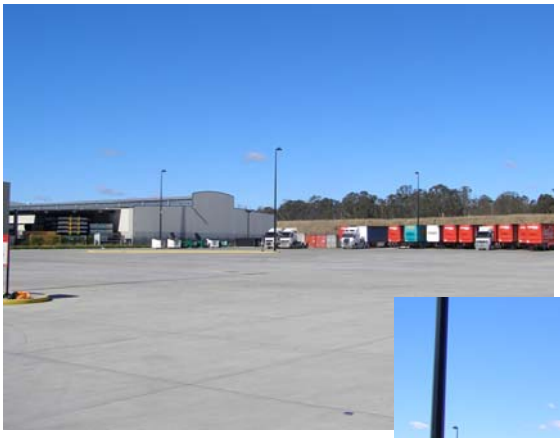
That part of the development approval has not yet been acted upon and it is now CCA's intention to construct the cold storage facility at the western end of the site.

In conjunction with the above relocation, CCA now proposes to develop the manufacturing facility the subject of this report in the south-eastern corner of the site, extending across existing paved areas into the as yet undeveloped area previously intended for the cold store building (refer Appendix 2 – Drawing No DA03/C).

The whole of the distribution centre site was cleared and levelled as part of the original estate development works.

The finished level of the site is well below the level of the adjoining land to the south.

Level differences along the southern boundary are currently handled with a combination of vertical concrete block retaining wall and temporary earth batters which extend into the site from the boundary fence.



Photographs of the south-eastern corner of the site showing the rear of adjoining industrial development to the east, and existing CCA truck parking along the southern site boundary, below the level of the adjoining land (water pipeline corridor).

Details of the proposed manufacturing facility development and its relationship to the distribution centre are provided in the following sections of this report.

1.6 Proposed Development

On behalf of CCA, Goodman Limited proposes to further develop part of the distribution centre site for the purposes of a plastics manufacturing facility.

The proposed manufacturing facility will produce "preforms" and "closures" associated with CCA's in-house blow-fill bottling operations in Australia, New Zealand, Fiji and Papua New Guinea.

The development is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979*, in part because it has a "capital investment value" in excess of $20 million, comprising construction costs of about $8 million and fit-out costs of about $47.5 million.

For the purposes of the WSEA Policy, the proposed development is defined as being an "industry".

Industries are permitted with consent in the General Industrial Zone.

This report supports the application for approval to construct and operate the proposed manufacturing facility on the distribution centre site.

An accompanying report supports a Goodman Property Services (Aust) Pty Ltd request to modify the existing development approval (Reference Number: DA-308-12-2004-i) to allow integration of the proposed manufacturing facility with the distribution centre.

1.7 Goodman

Goodman is an integrated property group that owns, develops and manages industrial property and business space globally.

Goodman invest in business parks, office parks, industrial estates and warehouse and distribution centres.

Goodman played a key role in the development of the M7 Industrial Estate (or "M7 Business Hub" as it was originally known) and has a continuing association with CCA in terms of the development of the subject site.

1.8 Coca-Cola Amatil

CCA is one of the largest bottlers of non-alcoholic ready-to-drink beverages in the Asia-Pacific region and one of the world's top five Coca-Cola bottlers.

CCA has operations in five countries – Australia, New Zealand, Fiji, Indonesia and Papua New Guinea – manufacturing , selling and distributing a diversified product portfolio including carbonated soft drinks, water, sports and energy drinks, fruit juice, flavoured milk, coffee and packaged ready-to-eat fruit and vegetable products.

CCA employs more than 15,000 people, including more than 1,850 people in New South Wales, and has access to more than 265 million customers through over 700,000 active customers.

CCA undertakes sustainability reporting consistent with the global framework for corporate social responsibility established by The Coca-Cola Company under the four pillars of Environment, Marketplace, Workplace and Community.

CCA's commitment in relation to each global pillar is reproduced in the table following.

Global Pillar	Commitment
Environment	To conduct business in ways that protect and preserve the environment and to integrate principles of environmental stewardship and sustainable development into our business decisions and processes.
Marketplace	To provide products and services that meet the beverage needs of consumers. In doing this, we provide sound and rewarding business opportunities and benefits for our customers, suppliers, distributors and local communities.
Workplace	To foster an open and inclusive work environment where a highly motivated, productive and committed workforce drives business success through superior execution.
Community	To invest time, expertise and resources to provide economic opportunity, improve the quality of life and foster goodwill in our communities through locally relevant initiatives.

From an Environment commitment perspective, CCA has identified three priorities, as reproduced in the table following.

Priority	
Water Stewardship	To make more beverages with less water, protect watersheds and ensure our water use and our water sources are sustainable.
Packaging & Recycling	We see packaging as a resource, not waste. We will continue to reduce the amount of packaging we use and ensure it is recyclable.
Energy & Climate	We will improve energy efficiency and reduce our carbon footprint.

These company commitments and priorities are relevant to the proposed development as further described in section 2 of this report.

A copy of the current CCA Sustainability Report is available on the company's website.

2 Project Description

2.1 Overview

The proposed plastics manufacturing facility will produce "preforms" (refer photos below) and "closures" (i.e. bottle caps) associated with CCA's existing and proposed in-house blow-fill bottling operations in Australia, New Zealand, Fiji and Papua New Guinea.

Example photograph of PET bottle preform

Example photograph of bin packed with preforms

The manufacturing process entails conversion of Polyethylene Terephthalate (PET) and High Density Polyethylene (HDPE) resin pellets to "preforms" and "closures" respectively.

The manufacturing process is described in section 2.7 of this report.

2.2 Need for the project

Previously, CCA purchased plastic beverage containers from other entities for filling, prior to despatch to customers.

However, CCA's commitment to sustainability, has led it to investigate and introduce new technologies to streamline and integrate production processes in-house.

In early 2010 CCA undertook a "step-change" in the sustainability of their packaging.

New $45 million "blow-fill" technology installed in their Northmead plant enables CCA to design and manufacture PET plastic beverage containers from preforms with the aim of making the lightest PET plastic bottles in Australia.

The lighter weight PET bottles are fully recyclable, and will also contain up to 20% recycled material comprising both pre- and post-consumer resin.

The proportion of recycled content, including of post-consumer resin, may be increased in the future.

The proposed manufacturing facility will produce preforms for the Northmead plant and other CCA bottling plants utilising blow-fill technology.

CCA proposes to commission additional blow-fill production lines between 2012 and 2017.

In-house production of preforms will enhance quality control and ensure the achievement of intended sustainability benefits.

These benefits include significant reductions in raw material requirements, energy requirements per unit and associated transportation requirements.

Further details regarding benefits are provided in section 4.8 of this report.

The alternative to proposed in-house production of preforms is to continue with third party supply arrangements.

2.3 Development Overview

MNIA Architects Pty Ltd has prepared a series of site plan drawings to illustrate how the proposed manufacturing facility will be integrated with the distribution centre (refer Appendix 2).

The following sections of this report describe the proposed distribution centre modifications and the proposed manufacturing facility development, with reference to those drawings.

Existing distribution centre elements that will be utilised by the manufacturing facility are also described below.

2.4 Proposed Distribution Centre Modifications

MNIA Architects Drawing No. DA01/B (Approved Site Plan with Proposed PET Facility) highlights the inter-relationship between the proposed manufacturing facility and the distribution centre components in the south-eastern corner of the site, leading to the approval modification requirements.

Drawing No. DA02/B (Modifications to Approved Site Plan) documents the modifications required to the current approval to allow integration of the proposed manufacturing facility with the distribution centre.

The proposed modifications are minor in the context of the existing distribution centre development.

The modifications include:

- relocation of truck parking, including provision for temporary truck parking pending subsequent staged development;
- relocation of truck wash facilities;
- relocation of waste area to temporary position pending subsequent staged development;
- construction of new pavement / extension of existing pavement associated with the above relocations;
- demolition of existing retaining wall and construction of new retaining wall with associated regrading of existing batter slope;
- removal of existing landscaping associated with retaining wall demolition and establishment of new landscaping associated with new retaining wall and adjacent batter slope treatment;
- minor reconfiguration of vehicle access arrangements at southern end of truck entry lanes; and
- relocation of the proposed cold store.

Minor earthworks and site preparation works will also be required in conjunction with the above, in addition to minor modifications to supplementary site services e.g. exterior lighting.

The above-described modifications are the subject of a separate Goodman Property Services (Aust) Pty Ltd "Request to modify a major project", made under section 75W of the *Environmental Planning and Assessment Act 1979*.

2.5 Proposed Manufacturing Facility Development

MNIA Architects Drawing No. DA03/C (Proposed PET Facility Site Plan) shows the proposed manufacturing facility relative to the modified distribution centre.

This drawing forms the basis of the application to construct and operate the manufacturing facility.

The proposed development includes the following elements, in addition to the modification elements described above:

- Minor earthworks and site preparation works, including removal of existing pavement;
- Construction of a c.11,000m2 industrial building in two stages (Stage 1 – 9,200m2, Stage 2 1,800m2) to house the manufacturing process and associated activities including product storage;
- Fit-out of manufacturing plant and associated equipment for use as a manufacturing facility;
- Fit-out of associated office and staff amenities;
- Construction of hardstand including vehicle movement areas primarily associated with the docks at the western end of building and the new fire access road;
- Construction of a fire access road between the building and the eastern and southern site boundaries;
- Connection to existing site services; and
- Augmentation of power services to the site / building to enable the manufacturing plant to operate.

The architectural drawings listed below and contained in Appendix 2 provide further details of the proposed facility:

- DA04/C: Proposed PET Facility Level 1 Floor Plan
- DA05/C: Proposed PET Facility Level 2 Floor Plan
- DA06/B: Proposed PET Facility Roof Plan
- DA07/C: Proposed PET Facility Stage 1 Elevations
- DA08/C: Proposed PET Facility Stage 2 Elevations
- DA09/C: Proposed PET Facility Sections
- DA10/C: Proposed PET Facility Office and Amenities Level 1 and 2 Plans

The architectural design of the proposed facility is functionally driven, with the building envelope effectively wrapping around specialist manufacturing equipment and warehouse storage racking.

The proposed facility contains a number of functional areas primarily including a production hall and a storage hall (refer Drawing No. DA04/C and DA05/C).

Receiving docks and silos, a regrind hall, technical room, and office and amenities are located at the eastern end of the facility.

Despatch activities will occur at the western end of the facility.

As shown on the architectural drawings, Stage 2 of the development involves a southward expansion of the storage hall and matching extension of the despatch awning.

Stage 2 is scheduled to be constructed by 2014 or if not by 2017.

However if economic conditions are favourable, CCA may opt to construct both stages at the same time.

The proposed manufacturing facility extends to a height of 17.4 metres over a relatively small area to accommodate the production hall mezzanine, however the bulk of the facility is less than 12.2 metres in height (refer Drawing No. DA07/C, DA08/C, and DA09/C).

This compares with the existing warehouse (pick operation) height of 13.75 metres and the proposed warehouse (high bay) height of 28.2 metres (refer Drawing No. DA08/C).

The treatment of the facility elevations has been closely linked to that of the award winning distribution centre design through the use of a similar colour scheme and materials.

The heavier base of the facility generally utilises corporate grey colouring, with elevated cladding coloured white, offset by a feature panel of corporate red.

A red free form awning, designed to reflect the Coca-Cola "ribbon device", has also been introduced along the northern elevation.

2.6 Manufacturing Facility Integration with Distribution Centre

A number of existing distribution centre elements will be "utilised" by the proposed manufacturing facility development in order to maximise integration and avoid duplication of activities and services.

The relevant elements include:

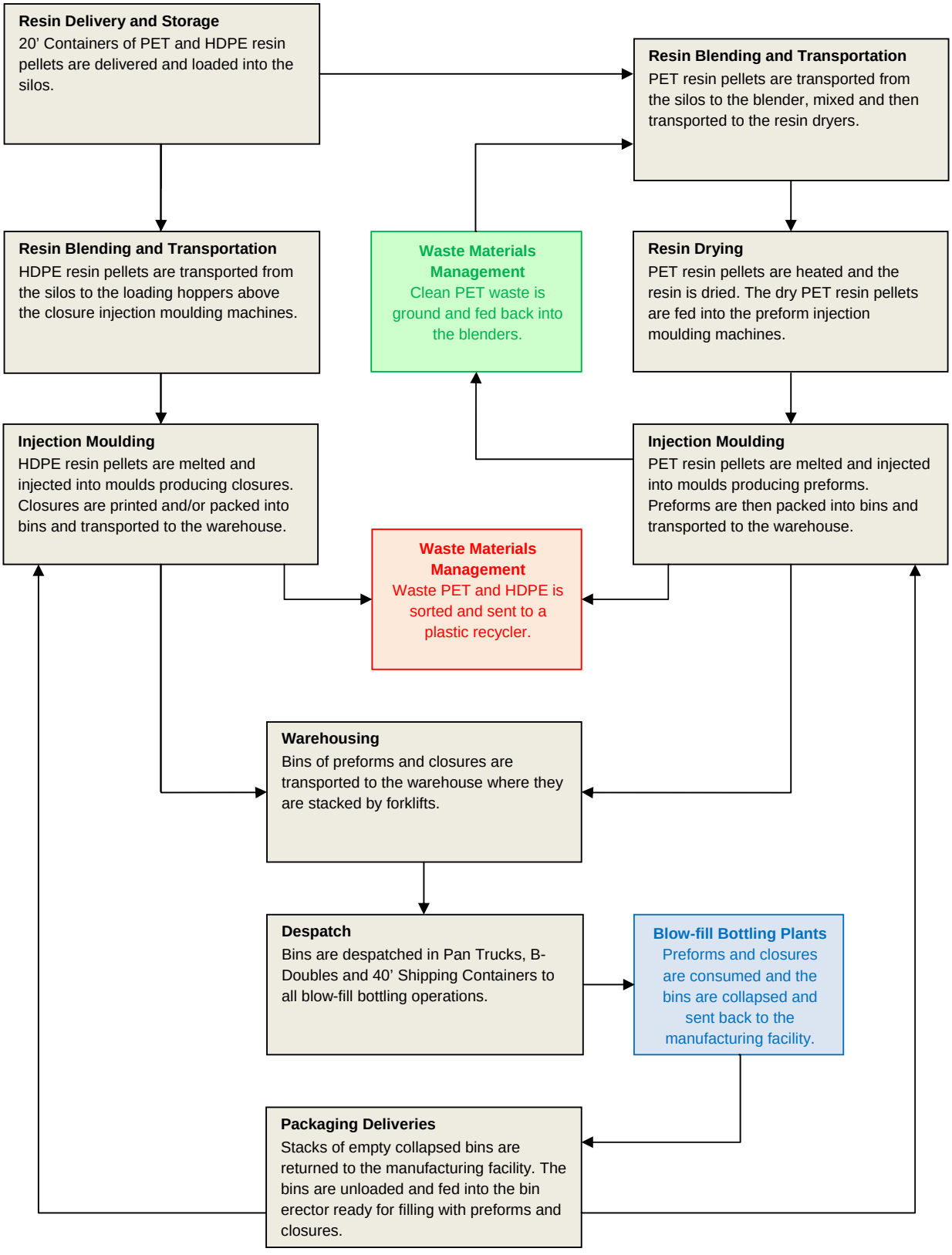
- Corporate and site specific systems, procedures and processes;
- Site identification signage;
- Site security;
- Site entry and exit points;
- Car parking;
- Gatehouse operation;
- Vehicle movement areas;
- Pedestrian movement arrangements;
- Site services and infrastructure;
- Canteen and associated staff amenities; and.
- Backfill loading of trucks to/from CCA's Northmead plant.

2.7 Manufacturing Process

The proposed manufacturing process entails converting Polyethylene Terephthalate (PET) and High Density Polyethylene (HDPE) resin pellets to preforms and closures respectively.

The steps of this process are illustrated in the diagram following.

CCA Preform and Closure Manufacturing Process Diagram



Additional details relating to each of the manufacturing process steps follow.

Example photographs of relevant plant and equipment are provided opposite.

Resin Delivery and Storage

Resin pellets are produced by a number of suppliers in a number of locations around the world, including Australia, Indonesia, South Korea, Thailand, USA and India.

CCA will purchase resin pellets from different suppliers after consideration of various factors, including price, quality and plant capacity.

Resin pellets procured from overseas are shipped to Sydney.

PET and HDPE resin pellets are trucked to site in 20 foot shipping containers lined with large plastic bags.

Each delivery of resin pellets weighs up to 25 tonnes.

The resin pellets are normally loaded (via gravity feed and/or vacuum) into a rotary valve located next to the silos.

An air blower transfers the resin pellets from the rotary valve up to the top of the resin silos where they are stored ready for use.

The unloading process for one container of resin pellets takes approximately one hour.

In some cases the rotary valve and air blower on-site will not be used to load the resin pellets into the silos as some of the delivery trucks are fitted with an air blower which can be connected to the silo pipe work directly.

All PET and HDPE resin pellets are stored in silos approximately 4.4 metres in diameter by 13 metres in height.

Resin Blending

PET resin pellets are transferred via vacuum pipe work from the bottom of the silos into the blending room where the resin pellets are loaded into the blender.

The PET resin pellets from the silo (virgin PET) are blended with recycled resin (regrind) produced from the small amount of plastic waste created during the start-up of the process (refer Waste Materials Management below).

Once the PET resin pellets have been blended, vacuum pipe work is then used to transfer the PET resin pellets to the resin dryers in the dryer room.

HDPE resin pellets are also transferred via vacuum pipe work from the bottom of the silos, however the HDPE resin pellets are transferred directly to the loading hopper on top of the closure injection moulding machine.

Resin Drying

PET resin pellets are loaded into the top of the resin dryers located in the dryer room.

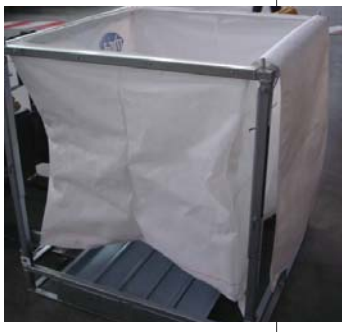
Each of the resin dryers holds approximately six tonnes of blended PET resin pellets.

Inside the dryer the resin pellets are heated up to 170°C for a period of four to six hours.

During this process the air in the dryer is circulated; the moisture in the air is removed by passing the air through a desiccant bed.

The drying process is a continuous process; the PET resin pellets loaded in the top of the dryer takes approximately four to six hours to reach the bottom of the dryer.

At the bottom of the dryer the hot PET resin pellets are fed into the preform injection moulding machine.



Injection Moulding

PET resin pellets are fed from the bottom of the resin dryer into the preform injection moulding machine where the pellets are melted with heat and pressure into molten PET.

The PET resin is then injected into a steel mould to produce PET preforms.

The preforms are then transferred from the preform injection moulding machine where they are packed into bins.

Bins hold from 8,000 to 17,000 preforms (average 12,000 preforms) depending on the preform size.

Automatic guided vehicles (AGVs) take the filled bins to the warehouse conveyor.

The AGVs also bring empty bins to the preform injection moulding machine for filling.

HDPE resin pellets are fed from the loading hopper located above the closure injection moulding machine where the pellets are melted with heat and pressure into molten HDPE.

The HDPE resin is then injected into a steel mould to produce HDPE closures.

Closures not requiring printing are then transferred from the closure injection moulding machine where they are packed into bins.

AGVs take the filled bins to the warehouse conveyor.

Closures requiring printing are not packed into bins but are transferred directly from the closure injection moulding machine via conveyors to the closure printing machines.

Closures are loaded into the closure printing machines where logos are printed onto their surface.

The printed closures are dried and then packed into bins.

Bins hold up to 80,000 closures.

AGVs take the filled bins to the warehouse conveyor.

The AGVs also bring empty bins to the closure injection moulding machine and closure printing machines for filling.

Warehousing

Bins containing preforms and closures are loaded onto the warehouse conveyor via AGVs where the bins are labelled and transferred from the injection moulding room into the warehouse.

The bins are then moved via forklifts into the warehouse where the bins are stacked.

Despatch

When the blow-fill bottling operations in Australia, New Zealand, Papa New Guinea or Fiji require preforms or closures, the bins are moved from the warehouse via forklifts to the despatch area.

Bins containing preforms and closures are loaded into different vehicles depending on their final destination.

The three methods of despatch are as follows:

- Northmead (NSW): Pan Trucks which are loaded via automatic loading / unloading docks;
- Interstate: B-Doubles which are loaded by forklifts; and
- Overseas: 40 foot shipping containers which are loaded by forklifts.

Articulated vehicles can carry approximately 40 bins, whereas B-Doubles can carry approximately 64 bins.

Pan Trucks used for deliveries in New South Wales may arrive on site with finished product (filled bottles) for delivery to the distribution centre.

Once these Pan Trucks have been unloaded into the distribution centre, the trucks can then be loaded with preforms or closures from the manufacturing facility and delivered to the blow-fill bottling plant at Northmead.

Packaging Deliveries

Once the preforms and closures have been consumed at the blow-fill bottling plants the empty bins will be collapsed and stacked.

The stacks of collapsed empty bins will then be loaded into Pan Trucks, B-Doubles or shipping containers depending on the location of the blow-fill bottling plant and then shipped back to the manufacturing facility at Eastern Creek.

The stacks of collapsed empty bins will be unloaded from Pan Trucks automatically via automatic loading / unloading docks.

B-Doubles and shipping containers will be unloaded via forklifts.

The stacks of bins will be stored in the warehouse until required.

Once the bins are required, forklifts will be used to load then onto the bin erection system where they will be de-stacked, erected and transferred via the warehouse conveyor to the injection moulding room.

Waste Materials Management

A small volume of waste PET and HDPE resin is produced at the start-up of the process (less than 0.1% of raw material).

This material is segregated and sold to plastic recyclers for use in non-food grade products (i.e. flower pots, pegs etc).

Clean PET waste is granulated on-site with a granulator.

Dust created during the process is collected and sold to plastic recyclers.

The clean granulated PET is blended with the virgin PET resin pellets as described above.

Ancillary Services

Ancillary services supporting the manufacturing process include:

– A chilled water system which includes air cooled condensers, pipe work, valves, pumps and tanks delivering chilled water to the preform injection moulding machines, closure injection moulding machines, resin dryers, mould dehumidifiers and the air conditioning plant.
– Air conditioning plant which includes cooling coils and fans to provide a temperature controlled environment for the injection moulding room.

Vehicle Movements

The following vehicle movements are expected in association with the operation of the manufacturing facility:

– deliveries to Northmead plant: 6 Pan Trucks per day.
– deliveries to interstate sites: 10 B-Doubles per day.
– deliveries to overseas sites: 8-10 40 foot shipping containers per week.
– PET and HDPE resin pellet deliveries: 7 20 foot shipping containers per day.

– deliveries of inks, chemicals, spare parts and other miscellaneous items: 1-2 various / small trucks per day.

Further process details, including in relation to process emissions and dangerous goods management, are provided in conjunction with the various assessment reports referenced in section 5 of this report.

2.8 Production Intentions

The proposed manufacturing facility is currently scheduled to commence operation in the second half of 2011.

The facility must operate 24 hours per day, 7 days per week as the processes utilised are continuous.

The facility will operate a 12 hour by four shift roster with up to 16 personnel on dayshift and a maximum of four personnel on the other shifts.

Projected annual facility production and associated resin usage is shown in the table following.

Year	Preforms Produced (no.)	PET Resin Usage (kg)	Closures Produced (no.)	HDPE Resin Usage (kg)
2012	903,201,000	25,285,613	903,201,000	2,213,039
2013	1,069,580,000	29,321,719	1,069,580,000	2,620,471
2014	1,264,320,000	34,143,488	1,264,320,000	3,097,584
2015	1,343,983,000	36,327,280	1,343,983,000	3,292,759
2016	1,407,704,000	38,045,122	1,407,704,000	3,448,875
2017	1,522,384,000	47,076,477	1,522,384,000	3,927,269

Products from the proposed manufacturing facility are projected to be distributed as follows:

– 27.4% to Northmead plant;

– 55.1% to interstate sites; and

– 17.5% to overseas sites.

These proportions relate to 2015 production figures and assume implementation of the blow-fill lines initiative across CCA bottling plants.

Each different size bottle is produced using a different sized preform.

Production volume and preform size will increase over time in line with the progressive commissioning of blow-fill lines within CCA bottling plants.

CCA will initially start producing small bottles for the existing Northmead plant using light preforms.

CCA will progressively move to also produce larger bottles for Northmead and elsewhere from heavier preforms.

As a result the average weight of the preforms produced will increase over time.

3 Director-General's Requirements

The Director-General's Requirements for the proposed development were issued by the Department of Planning under cover of correspondence dated 23 August 2010 (refer Appendix 1).

The table following summarises the main requirements and identifies where they are addressed in this report.

Requirement	Report Content
Detailed description of the project	Section 2
Risk assessment	Section 3.1
Key and Other Issues	Section 4
Strategic and Statutory Context	Sections 4.1 and 5
Noise	Section 4.2 and Appendix 3
Traffic	Section 4.3 and Appendix 4
Air Quality and Odour	Section 4.4 and Appendix 5
Visual	Section 4.5
Soil and Water	Section 4.6 and Appendices 6, 7 & 8
Waste Management	Section 4.7 and Appendix 9
Lifecycle assessment	Section 4.8
Greenhouse Gas and Energy Efficiency	Section 4.9 and Appendix 5
Hazards and Risks	Section 4.10 and Appendix 10
Statement of Commitments	Section 6

NSW Roads and Traffic Authority and Blacktown City Council issues, as provided by the Department of Planning in conjunction with the Director-General's Requirements, have been integrated into the relevant assessment where appropriate.

Contact was made with representatives of Blacktown City Council, the NSW Department of Environment, Climate Change and Water, and the NSW Roads and Traffic Authority in relation to the Director-General's Requirements.

3.1 Risk Assessment

The Director-General's Requirements include:

a risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment

Response:

The proposed manufacturing facility has been designed to integrate with existing and proposed future distribution centre operations.

As such, it will have minimal impact on those operations.

Equally, the modifications required to allow the integration will have little if any additional impact beyond the boundaries of the site, as they effectively constitute a re-organisation of existing / approved distribution centre components.

The scope of potential environmental impacts associated with the proposed manufacturing facility is minimised by virtue of the:

– site and development location attributes;
– extent and nature of existing and approved development; and
– nature of the proposed manufacturing process and the related hazards and emissions profile.

Relevant assessments (refer section 4 of this report) have identified that the proposed development will have only minor if any impacts beyond the boundaries of the site.

For example:

– Noise emissions are within relevant limits
– Increases in traffic are within the capacity of the surrounding road network;
– Emissions to air are negligible; and
– Operations are neither offensive nor hazardous.

The project also has broader sustainability including environmental benefits when considered in association with CCA's move to in-house blow-fill bottle manufacture.

These benefits include reductions in raw material requirements, energy requirements per unit and associated transportation requirements.

In addition, the proposed development is generally consistent with NSW Government and Blacktown City Council intentions for the Western Sydney Employment Area / Eastern Creek Precinct Plan area.

4 Issues for Consideration

This section addresses the assessment of the key issues identified in relation to the project, in accordance with the Director-General's Requirements.

4.1 Strategic and Statutory Context

Director-General's Requirements:

Including:

- *Detailed justification for the proposal and suitability of the site to be developed;*
- *Demonstration that the proposal is generally consistent with:*
  - *The State Environmental Planning Policy (Western Sydney Employment Area) 2009;*
  - *Any relevant development control plans (DCP);*
  - *The NSW State Plan, Metropolitan Strategy and draft subregional strategy; and*
  - *Justification for any inconsistencies.*

Response:

The response to this requirement is presented below.

Proposal Justification

CCA continues to introduce new technologies to streamline and integrate production processes in-house.

Construction of the proposed manufacturing facility confirms CCAs's long-term commitment to the Eastern Creek site and to the local and State economy.

The proposed development forms a key part of CCA's commitment to sustainability, and the sustainability of beverage packaging in particular, as outlined in section 2.2 of this report.

The supply chain benefits expected to be achieved by the move from merchant bottle supply to in-house blow fill bottle manufacture are described in section 4.8 of this report.

The benefits include significant reductions in raw material requirements, energy requirements per unit, and associated transportation requirements.

These matters and benefits provide justification for the proposal.

Site Suitability

A number of aspects determine the suitability of the site for the proposed development.

Firstly, CCA currently operates a distribution centre from the subject site, which takes advantage of the excellent accessibility provided by the local road system.

Scope exists to integrate the proposed manufacturing facility with the existing and proposed / approved distribution centre operations as described in section 2.4 of this report.

Synergies already exist between CCA's Eastern Creek facility and Northmead facility where the proposed outputs will be utilised.

The proposed use is consistent with State and Local Government intentions for the site and the broader area as reflected in State Environmental Planning Policy (Western Sydney Employment Area) 2009 and the Eastern Creek Precinct Plan.

The site is included in the General Industrial zone and industries of the kind proposed are permitted with consent in that zone.

On this basis, the site is suitable for the proposed development.

Proposal Consistency with Planning Documents

Relevant state, regional and local planning documents are addressed in section 5 of this report.

The proposal is generally consistent with those documents.

4.2 Noise

Director-General's Requirements:

Including a quantitative assessment of the potential construction, operational and traffic noise impacts of the project.

Response:

Heggies Pty Ltd has undertaken a Noise Impact Assessment for the construction and operation of the proposed facility (refer Appendix 3).

The subject report provides a description of the site and of the proposal before identifying the nearest sensitive receptors.

The nearest residence is approximately 500 metres to the south of the site.

Computer noise modelling has been carried out to predict the noise level, from the CCA facility, at the nearest residential receiver locations.

The cumulative noise emissions from the existing CCA operation and the proposed operation have been assessed against relevant noise criteria.

The noise emissions are predicted to comply with those criteria under relevant meteorological conditions.

The potential for sleep disturbance at nearby residential locations from night-time operations has also been assessed.

From the noise modelling results, the noise levels are predicted to be below the relevant noise goals.

The potential noise emissions from the proposed construction of the manufacturing facility have been assessed in accordance with DECCW's Interim Construction Noise Guideline.

From the noise modelling results, the noise levels at the nearest residences indicate compliance with the relevant noise goals.

In addition, the predicted road traffic noise level increases shows that all roads surrounding the proposed facility are likely to meet the project specific noise criteria.

The report concludes that the noise emissions arising from the construction and operation of the proposed facility are predicted to comply with the relevant noise criteria and the potential noise impact is likely to be negligible.

4.3 Traffic

Director-General's Requirements:

An assessment that includes:

- *Details of the proposed access and parking arrangements on site;*
- *Details of the traffic volumes likely to be generated during construction and operation;*
- *An assessment of the predicted impacts of this traffic on the safety and efficiency of the surrounding road network specifically the Roussell Road / Walgrove Road intersection;*

– *Details of any proposed road upgrade works, and the measures that would be implemented to ensure that the relevant road network is appropriately maintained during the life of the project;*

– *An assessment of cumulative impacts.*

Response:

Colston Budd Hunt & Kafes Pty Ltd has prepared a report and a supplementary letter examining the traffic and parking implications of the proposed manufacturing facility (refer Appendix 4).

Consultation with representatives of the NSW Roads and Traffic Authority occurred during the preparation of this report.

The report describes the existing conditions in terms of the: site location; road network; traffic flows; intersection operation (including a SIDRA analysis; and, public transport.

It then addresses the implications of the proposed development.

The report concludes that:

– The existing parking provision is considered appropriate;

– The existing access arrangements are being retained;

– Internal circulation and servicing arrangements are considered appropriate; and

– The surrounding road network (and intersection controls) can cater for the traffic generated by the proposed development.

4.4 Air Quality and Odour

Director-General's Requirements:

Including a quantitative assessment of the potential air quality and odour impacts of the project.

Response:

Heggies Pty Ltd has conducted an Air Quality Assessment for the operation of the proposed manufacturing facility (refer Appendix 5).

The subject report provides a description of the site and of the proposal before identifying the nearest sensitive receptors.

The nearest residence is approximately 500 metres to the south of the site.

The report also explains the manufacturing process steps.

Relevant items of plant and equipment are identified along with the associated air emissions.

There are no major emissions to air arising from the process.

This has been confirmed by the manufacturer of the plant and equipment.

However there are fugitive emissions of Volatile Organic Compunds (VOCs) arising from the printing process.

Given the above, a quantitative assessment of potential air quality and odour impacts was not undertaken.

An officer from the Department of Environment, Climate Change and Water (DECCW) confirmed that a quantitative assessment was not necessary.

However the officer requested that fugitive emissions from the printers be appropriately captured and treated.

CCA therefore propose to install an extraction system, incorporating an afterburner to mitigate the VOCs.

It is anticipated that the afterburner will eliminate 99% of VOC emissions vented to atmosphere.

The air quality assessment concludes that:

- There is no stack associated with the project used to emit anything other than hot air;
- There are no significant emissions of particulate from the project;
- There are no significant combustion emissions from the project; and
- Fugitive emissions of VOC are emitted from the printers, which can be effectively mitigated using an extraction system and afterburner.

With the nearest sensitive receiver being approximately 500 metres from the project site, and no major emission sources, air emissions are therefore not anticipated to have a negative impact with regard to air quality.

4.5 Visual

Director-General's Requirements:

Including:

- *Details on the design and articulation of the building, any landscaping, screening, signage and lighting;*
- *An assessment of the potential visual impacts of the project on the amenity of the surrounding area.*

Response:

The site / proposed development is located within the M7 Industrial Estate.

Land within the industrial estate has been developed for industrial and related purposes.

That part of the subject site to be utilised for the proposed development is not readily visible from beyond the site boundaries given local topography and existing distribution centre and adjacent industrial development.

The positioning of the existing facility places the main office and staff amenities areas at the most visually prominent aspect; the north eastern elevations facing onto Roussell Road.

These areas have the highest quality of elevational treatment through the use of material such as aluminium composite feature panels and performance glazing.

The dock area and truck manoeuvring pavements are located at the rear of the site.

The coca-cola "ribbon device", which is synonymous with the brand, was used as the inspiration to subtly soften and break up the most prominent elevations.

This was achieved through the use of a swirl element along the northern elevation , the floating curved over-flying rooves to the office areas and the truck entry, and a swirl or free form walkway along the eastern elevation.

The colour scheme was then based on the CCA corporate colour scheme, with coke red used for the swirl elements to break up a solid corporate grey base to reflect "earth" and white colours above to reflect the sky and clouds.

The use of coloured feature panels has also been used to reduce the scale of the elevations and minimise the visual impact.

The design of the proposed building is described in section 2.5 of this report and depicted on the attached architectural drawings.

The massing of the proposed facility is functionally driven to enable effective operation, with the building envelope wrapping around equipment and storage areas.

The proposed facility extends to a height of 17.4 metres over a relatively small area to accommodate the production hall mezzanine; however the bulk of the facility is less than 12.2 metres in height.

This compares with the existing warehouse (pick operation) height of 13.75 metres and the proposed warehouse (high bay) height of 28.2 metres.

The treatment of the facility elevations has been closely linked to that of the award winning distribution centre design through the use of a similar colour scheme and high quality materials, feature panels and the use of a similar swirl or "ribbon device" to soften the appearance of the elevations.

The articulation to the elevations has been done through the use of colour and quality materials, with the heavier base of the building in corporate grey, and the higher level cladding white, broken up with a feature panel of corporate red.

The most visible elevation of the new building is the northern, which can be viewed from Roussell Road, behind the distribution centre gate house.

The articulation on the elevation has been taken further with the introduction of a free form or swirl awning similar to the eastern elevation of the existing facility, and through the use of recessed glazing at the entrance and to the office areas.

"Coca-Cola" signage is also proposed on the northern elevation integrated with the corporate red feature panel associated with the production hall mezzanine.

The proposed manufacturing facility design is consistent with / will complement the existing distribution centre and will enhance the overall visual appearance of the site.

It will not detrimentally affect the amenity of the surrounding area.

4.6 Soil and Water

Director-General's Requirements:

Including water supply and efficiency, proposed erosion and sediment controls (during construction); the proposed stormwater management system for the site; detailed consideration of any potential offsite drainage or flooding impacts; consideration of the potential for rainwater harvesting; wastewater disposal; and soil salinity and contamination.

Response:

A number of the issues raised have been addressed in detail as part of the original industrial estate and site development application assessment and approval.

As noted previously, development and use of the land comprising the estate and of the subject site has proceeded / is proceeding generally in accordance with the original approval as modified.

Costin Roe Consulting Pty Ltd has prepared a Stormwater Management Plan for the proposed development that addresses integration with the existing distribution centre development (refer Appendix 6).

Stormwater connections are proposed to existing infrastructure which allowed for further development in the southern / south-eastern part of the subject site.

Stormwater from the site will discharge to Reedy Creek through the existing stormwater system provided during the recently constructed distribution centre.

The existing stormwater system allows for scour protection at outlet points and appropriate water quality controls which include gross pollutant tanks, siphon actuated filtration and a large bio-retention basin in the north of the site.

No additional on-site detention systems or water quality measures are proposed for the development.

The existing facility has incorporated a roof water re-use system in which half of the roof water is collected in above ground tanks on site for re-use in toilet flushing, truck wash and irrigation.

This existing system will be connected to the new facility for toilet flushing and the relocated truck wash.

Hydraulic calculations will be carried out during detail design stage utilising DRAINS modelling software to ensure that all surface and subsurface drainage systems perform to or exceed the required standard.

Costin Roe Consulting Pty Ltd has also prepared an Erosion & Sediment Control Plan for the proposed development (refer Appendix 13).

Correspondence from Megex Civil dated 17 December 2008 (refer Appendix 7) advises that all fill imported as part of the original site development works was classified as "Virgin Excavated Natural Material".

Megex Civil hold all classification certificates and geotechnical reports and testing results.

There is no evidence of site contamination.

Douglas Partners Pty Ltd prepared a Report on Salinity Study for the original estate development, including the subject site (refer Appendix 8).

The report indicates slightly saline to moderately saline conditions throughout the Eastern Precinct, including the subject site, where imported filling had reached final levels.

The report provides general and additional strategies to be applied in the design and construction of buildings or infrastructure.

4.7 Waste Management

Director-General's Requirements:

Including classification of all potential sources of liquid and non-liquid wastes to be generated at the site and describe how this waste would be handled, processed and if necessary disposed of.

Response:

Heggies Pty Ltd has prepared a waste management plan for the construction and operation of the proposed manufacturing facility (refer Appendix 9).

The principal objective of the waste management plan is to identify all potential wastes likely to be generated on site during development and post development phases of the project, including a description of how waste would be handled, processed and disposed of (or reused / recycled).

The demolition / construction phase of the project will generate the following general solid (non-putrescible) waste streams:

– Demolition materials, including fencing;

– Green waste from the removal of vegetation; and

– General construction waste.

A comprehensive Waste Management Plan should be provided and implemented by the building contractor.

Matters relating to: waste avoidance; reuse, recycling and disposal; waste storage and servicing; and contaminated / hazardous waste (if any), should be addressed.

The operational phase of the project will generate the following waste streams:

– General solid waste;

– Hazardous waste (i.e. waste hydraulic oil, empty ink drums, empty colourant drums); and

– Liquid waste (i.e. waste water)

Gaseous waste streams may also result from various manufacturing process systems.

Matters relating to: waste storage and servicing; signage and education for staff; and monitoring and reporting requirements, should be addressed by CCA in conjunction with their waste minimisation / recycling strategies.

4.8 Lifecycle assessment

Director-General's Requirements:

Including an evaluation of the potential environmental impacts of each stage of the products lifecycle.

Response:

PET bottle manufacture commenced in Australia in 1978.

The drivers to use of PET versus existing packaging mediums of glass and aluminium were:

– Economic: a lower energy footprint to produce an equivalent package to glass and/or aluminium together with lighter weight and resistance to breakage reduced the overall cost of packaging beverage compared to the traditional mediums.

– Safety: with the move into larger packages PET offered a package which was shatterproof and consumer safe.

– Consumer appeal: the lightweight of PET versus glass and visibility of the contents were features appealing to the consumer; the design freedom afforded with the PET plastic package gave way to a whole new generation of package designs.

– Lightweight: with a weight factor of approx 10:1 versus glass, PET was readily accepted by the consumer; since 1978 the weight of PET beverage packages has reduced by approximately 30 percent.

  Today, technology developments are driving further light weighting of PET bottles without compromising the beverage product delivery to the consumer

Lifecycle Description

A description of the lifecycle of a PET plastic beverage bottle follows, commencing with processes at the PET Preform Plant or plastics manufacturing facility that is the subject of this report.

A diagram depicting the lifecycle is also provided below.

<u>PET Preform Plant</u>

The starting point for the production of PET bottles is by the injection moulding of the precursor bottle or preform.

The blend of virgin PET resin and post-consumer PET resin is dried, melted and formed into a shape resembling a test tube.

This preform is then converted to a finished bottle in the next production process.

Beverage Plant

The preforms are shipped to the Beverage Plant and are converted to bottles, filled and capped on a blow-fill integrated blow and fill machine

The filled bottles are packaged into saleable units, and warehoused awaiting distribution.

Distribution and Beverage Sales

The finished packs of PET bottles are distributed throughout the system to the sales outlets e.g. supermarkets, corner stores and vending machines, and are purchased for consumption by the consumer.

Consumer

After consumption, the consumer disposes of the empty package which depends on the relative social occasion in which the beverage is consumed.

Post Consumer Bottle Collection

In the home environment the PET bottles are segregated for collection in a recycling bin provided by local councils which are collected via kerbside collection.

At other venues such as shopping centres and sporting / entertainment venues the PET bottles are segregated in collection bins provided by recyclers and are returned to them for sorting.

Materials Recycling Facility

All collected PET bottles are delivered to the materials recycling facility for sorting.

These centres not only handle PET but segregate paper, cardboard, glass, PET and mixed plastics for on sale to the recycling plants depending on the processes required.

For PET the bottles are sorted into a clean stream of bottles which are baled ready for sale.

PET Recycling Plant

The baled post-consumer PET bottles are broken down into flakes which are subject to several processes to make them fit for re-use.

These processes include size reduction, washing, colour sorting, solid state polymerisation and pelletisation, so that at the end of the process food grade pellets of recycled / post-consumer PET resin are produced which are suitable for incorporation back in to new bottles.

Post-Consumer PET Resin

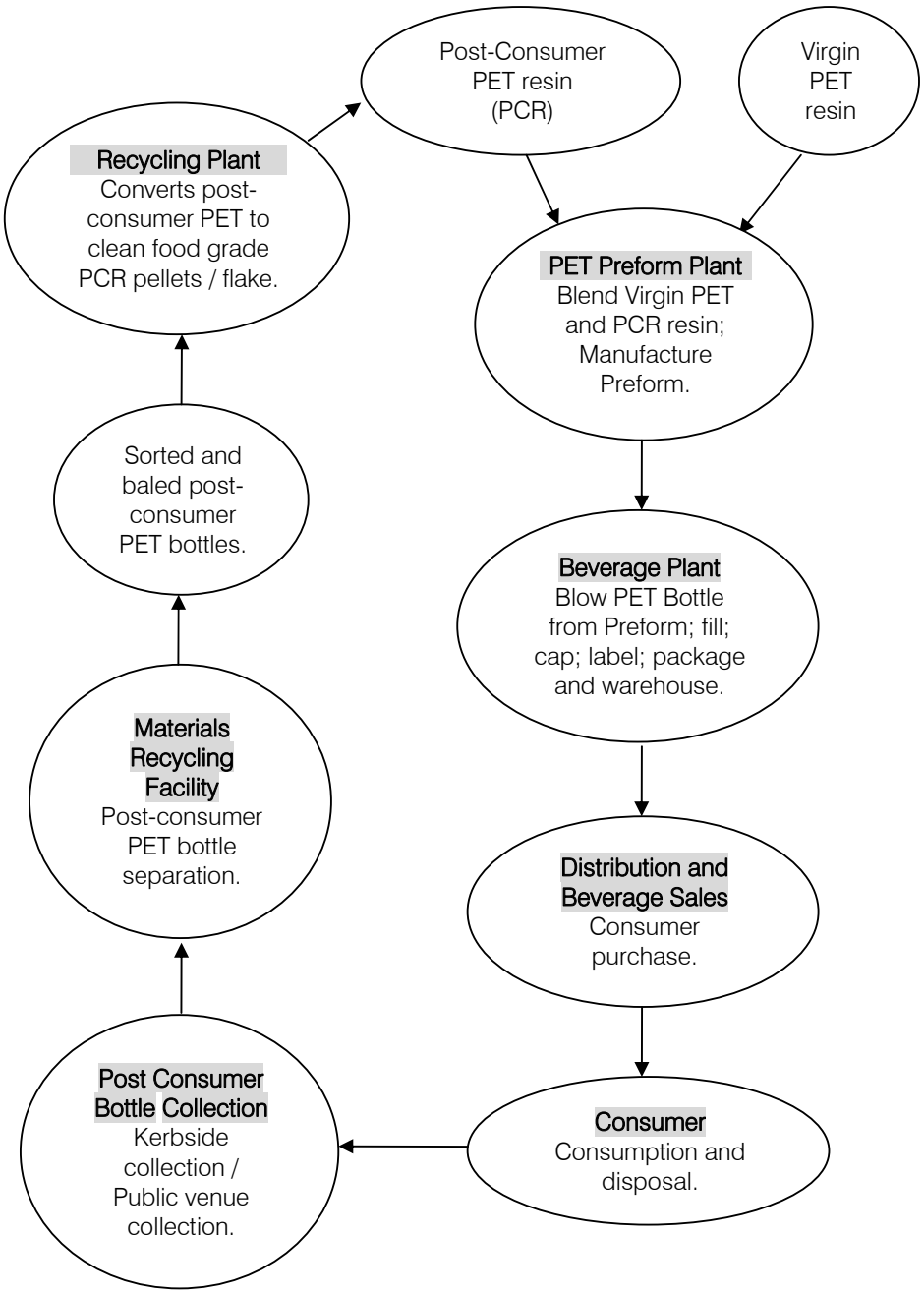
The post-consumer PET resin produced by the recycling plant is then sold back to the preform manufacturer (or other processors of PET) for re-use.

The following additional information relating to packaging and recycling is drawn from CCA's current Sustainability Report.

- In 1994, CCA was the first company in the world to package a food-grade product using recycled content in PET.
- Since 2004, CCA's PET beverage containers have been "light-weighted", or made using less plastic, saving more than 21,000 tonnes of PET, or 625 million bottles.
- In 2010 CCA aims to manufacture Australia's lightest beverage bottles utilising new blow-fill technology and save 1,000 tonnes of PET plastic resin in the first year of operations; this is equivalent to 8,000 tonnes of CO_2 emissions saved,

- CCA is a leading member of the Packaging Stewardship Forum (PSF) which is a delivery organisation for industry recycling, resource recovery, litter reduction and education programs.
- The PSF is best known for the iconic "Do the Right Thing" campaign.
- Since 2004 when CCA launched the "Refresh Recycle Renew" campaign the company has invested significantly in public education and public place recycling.
- CCA's progress in public place recycling was independently recognised at the 2009 Packaging Evolution Awards where the company received the Beverage Packaging Action Award and the Retail Packaging Action Award.
- CCA is a founding member of Australia's National Packaging Covenant, a joint initiative established in 1999 between government and industry to manage the environmental impacts of consumer packaging, as well as highlighting the importance of packaging minimisation through the supply chain.

Lifecycle of a PET beverage bottle



Supply Chain Benefits

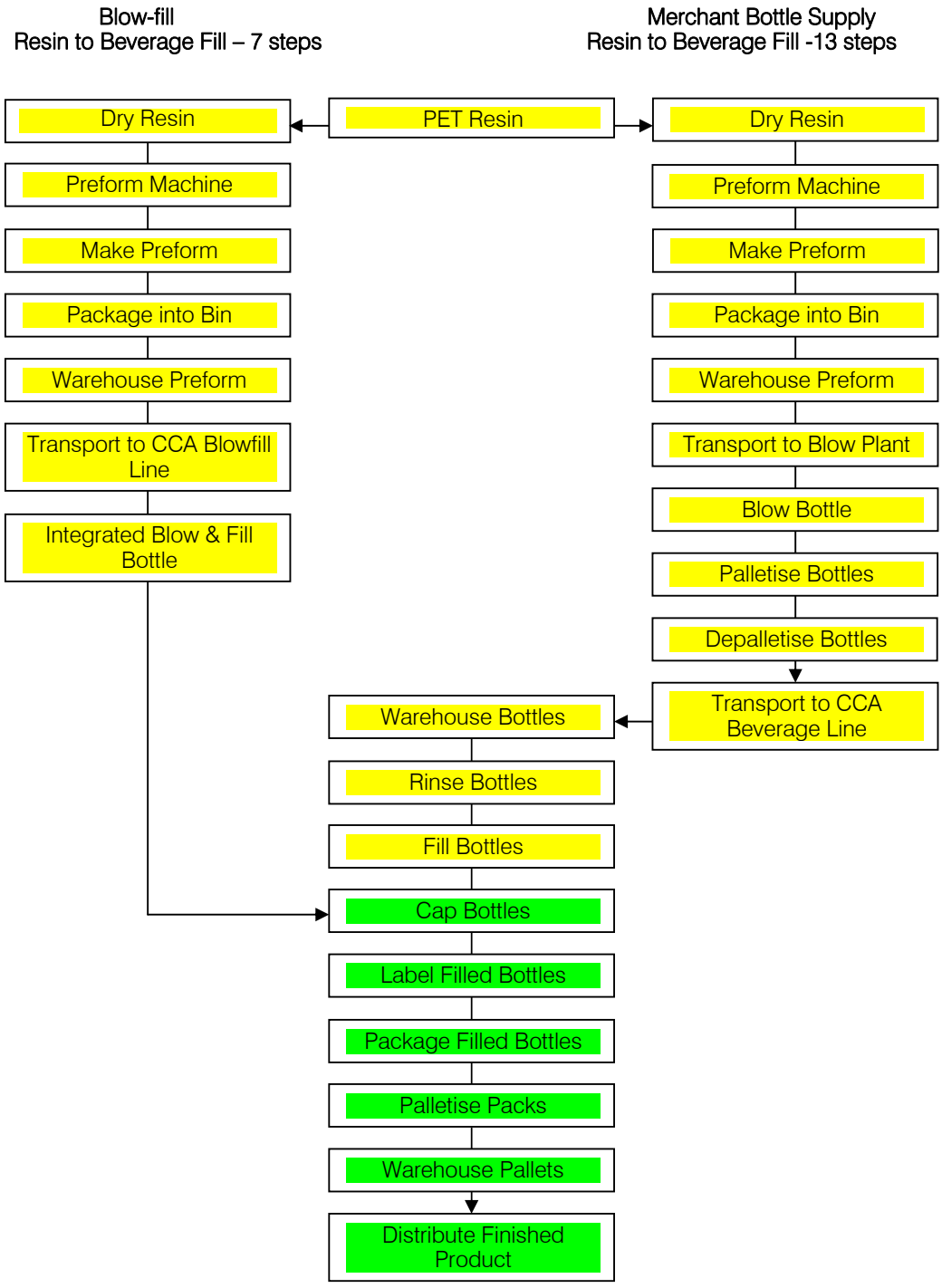
The supply chain benefits expected to be achieved by the move from merchant bottle supply to in-house blow-fill bottle manufacture as facilitated by the proposed development, include:

- Investment in latest technology drying systems will reduce energy required to dry PET resin prior to moulding.
- Latest technology injection moulding machine will produce preforms faster with a lower energy requirement per unit.
- It is estimated that a 5-10% energy saving will be achievable in the preform manufacture process.
- New preforms will be 20-30% lighter on average than currently produced by the merchant supplier resulting in less PET going into the environment.
- Up to 20% more preforms can be packaged in each bin with similar reductions in freight costs to transport to the blow-fill plant.
- Removing the requirement to store finished pallets of bottles, along with optimised packaging of preforms, will reduce warehouse requirements by up to 70%.
- Transport costs will be reduced as pallets of bottles will no longer be transported to the beverage filling plant only preforms.
- The ratio of reduction of bottles to preforms for local supply is 7:1 (i.e. 7 preforms for every bottle) on average and for interstate delivery is 11.1.
- An overall reduction in freight costs of 15-20% is expected.
- De-palletising and rinsing of bottles is no longer required as preforms are automatically fed to the integrated blow-fill machine.
- State of the art fillers deliver tighter controls over fill and carbonation volumes resulting in a more consistent product for the consumer.
- New closures have been developed which are 22% lighter than those currently used resulting in further reductions in raw material requirements.
- Bottle range diameters will be standardised leading to a reduction in the number of label feedstock variants.
- Standardising bottle diameters will also result in a reduction in warehousing requirements of up to 10% as a greater number of filled packs of bottles will be loaded on each pallet.
- Improved freight efficiencies will be achieved as more packs of finished product will be able to be delivered to customers with up to 10% fewer truck movements.

These benefits are consistent with CCA's commitment to sustainability.

The diagram below illustrates the process efficiencies gained in moving from merchant bottle supply to in-house blow-fill bottle manufacture.

Supply Chain Reduction of Blow-fill versus Merchant Bottle Supply



4.9 Greenhouse gas and energy efficiency

Director-General's Requirements:

Including:

- *A quantitative assessment of the scope 1 and 2 greenhouse gas emissions of the project;*
- *A qualitative assessment of the potential impacts of these emissions on the environment; and*
- *An assessment of all reasonable and feasible measures that could be implemented to minimise the generation of greenhouse gas emissions associated with the project.*

Response:

Heggies Pty Ltd has undertaken a quantitative greenhouse gas (GHG) assessment to estimate potential GHG emissions associated with the project (refer Appendix 5).

The subject report provides a description of the site and of the proposal.

The report also explains the manufacturing process steps.

Quantification of potential project emissions has been undertaken in relation to both carbon dioxide (CO_2) and other non-CO_2 greenhouse gas emissions.

The greenhouse gas emissions associated with the project have been assessed in terms of direct (Scope 1) emission potential, and indirect (Scope 2) emission potential.

Potential emission sources have been identified.

Direct emissions relate to the combustion of diesel associated with the transportation of resin to the site.

Indirect emissions relate to the consumption of purchased electricity utilised in the manufacturing process.

A comparison of the predicted project emissions against Australia's 2007 net emissions of 597 Mt CO_2-e demonstrates the project would represent approximately 0.005% of the total annual Australian emissions.

As outlined in section 4.8, it is estimated that a 5-10% energy saving will be achievable in the preform manufacture process.

For example, the use of latest technology injection moulding machines will produce preforms faster with a lower energy requirement per unit.

4.10 Hazards and Risks

Director-General's Requirements:

Including potential hazard and risk from the storage and use of any hazardous materials and any potential fire risk and management.

Response:

Heggies Pty Ltd has undertaken a Risk and Hazard Assessment for the proposed manufacturing facility (refer Appendix 10).

The subject report includes an overview of the proposed development.

An environmental hazard analysis has been undertaken that examines environmental aspects and safeguard measures that will be needed to reduce the risk of environmental harm to a negligible level.

Hazard identification charts have been prepared for various operating scenarios relevant to the proposed development.

A series of potentially hazardous events or scenarios were considered to require a comprehensive qualitative analysis.

The events / scenarios are as follows:

– Spillage in Minor Chemical Storage Area;

– Spillage in the Ink Storage Area; and

– Fire involving spilled materials.

The events / scenarios were considered unlikely to occur with appropriate safeguards in place.

The assessment found that the operation of the proposed development would not cause any risk, significant or minor, to the community.

Furthermore, it found that the proposed operations are not an offensive or hazardous industry based on applying the NSW Department of Planning guidelines.

The report concludes that the proposed development meets all relevant safety requirements stipulated by the NSW Department of Planning and hence would not be considered to be an offensive or hazardous development.

4.11 Other Issues

Blackett Maguire + Goldsmith Pty Ltd has prepared a BCA Assessment Report for the proposed manufacturing facility (refer Appendix 11).

The report concludes that compliance with the relevant deemed-to-satisfy provisions and identified performance requirements are readily achievable, however full details demonstrating compliance are required to be submitted with the construction certificate application.

RAW Fire Safety Engineering has also prepared a Fire Safety Strategy for the proposed manufacturing facility (refer Appendix 12).

The Fire Safety Strategy has been prepared to nominate proposed Alternative Solutions for assessing compliance with the nominated performance requirements of the Building Code of Australia in accordance with the methodologies defined in the International Fire Engineering Guidelines.

5 Strategic and Statutory Context

This section addresses the level to which the proposal is consistent with relevant strategic and statutory planning documents.

Consideration is initially given to the NSW State Plan, the Metropolitan Strategy and the Draft North West Subregional Strategy.

Consideration is also given to State Environmental Planning Policy (Major Development) 2005 which facilitates determination of the relevant assessment and approval process.

The key documents impacting development of the subject site are the State Environmental Planning Policy (Western Sydney Employment Area) 2009, and the Eastern Creek Precinct Plan.

The proposal will not have a significant impact on matters of National Environmental Significance, and will not require an approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

5.1 NSW State Plan

The State Plan (NSW Government, 2010) is a New South Wales wide long term plan to deliver services to NSW people.

The State Plan is the community's vision for the future of NSW in which:

- *Our transport network is world class, safe, reliable and integrated.*
- *Our cities and towns are great places to live, and we experience a high quality of life.*
- *Our economy grows stronger, supporting jobs and attracting business investment.*
- *Our children are better educated, our people more skilled and we are known for our research and innovation.*
- *Our health system provides the highest quality care accessible to all.*
- *Our energy is clean, our natural environment is protected and we are leaders in tackling climate change.*
- *Our community is strong and the most disadvantaged communities and our most vulnerable citizens are supported.*
- *Our police and justice system keep the community safe.*

The Plan sets what will be achieved for NSW, how this will be achieved and sets targets to measure the achievements.

With the intention of supporting jobs, actions falling out of the State Plan relate to the Western Sydney Business Growth Plan and the Western Sydney Employment Fund.

Given that the proposed development is located within the Western Sydney focus area and is capable of producing further employment opportunities, it is considered to be in keeping with the intentions for the State Plan.

5.2 Metropolitan Strategy

The Metropolitan Strategy (NSW Government, 2005) is a city wide planning document with a 2031 horizon.

The Metropolitan Strategy sets strategic directions for Government decisions on the timing and location of investment and seeks to increase employment opportunities in rapidly growing subregions and strategic centres.

To support this, the Metropolitan Strategy sets out employment planning capacity targets for Sydney's subregions and strategic centres, including the North West Subregion where the subject site is located.

5.3 Draft North West Subregional Strategy

As a part of the NSW Government's Metropolitan Strategy referenced above, the draft North West Subregional Strategy (NSW Government, 2007) sets out a management and development plan for north western Sydney over the next 25 years.

The key directions for the Strategy include:

- *Plan to meet employment and housing capacity targets;*
- *Develop Penrith as a Regional City;*
- *Strengthen the role of Centres;*
- *Improve access to, from and within the Subregion;*
- *Protect rural and resource lands;*
- *Promote the environmental and scenic qualities of the region; and*
- *Improve access to open space and recreation opportunities.*

The employment target for the North West Subregion is to reach 367,000 jobs by 2031, which represents an additional 130,000 jobs.

The subject site is within an area targeted to create a further 45,000 jobs.

The proposal is consistent with the Subregional Strategy in particular Action 1.5 which is to protect and enhance employment lands of State significance.

The site is located within the Eastern Creek Precinct of the Western Sydney Employment Hub as shown on Figure 10 of the Subregional Strategy.

5.4 State Environmental Planning Policy (Major Development) 2005

The aims of State Environmental Planning Policy (Major Development) 2005 include:

> a) *to identify development to which the development assessment and approval process under Part 3A of the Act applies;*
>
> e) *to rationalise and clarify the provisions making the Minister the approval authority for development and sites of State significance, … .*

Development that, in the opinion of the Minister, is development of a kind described in Schedule 1 of the Policy is declared to be a project to which Part 3A of the Act applies.

The proposed development triggers the criteria in Clause 10 (Chemical, manufacturing and related industries) of Schedule 1, in that it involves industrial development for the purpose of manufacturing (or reprocessing) plastics and has a capital investment value of more than $20 million.

The development is estimated to have a capital investment value in excess of $50 million, comprising construction costs of about $8 million and fit-out costs of about $47.5 million.

The development assessment and approval process under Part 3A of the *Environmental Planning and Assessment Act 1979* therefore applies to the proposed development.

5.5 Blacktown Local Environmental Plan

The subject site is located within the Blacktown Local Government Area.

The Blacktown Local Environmental Plan 1988 applies to the whole of the Blacktown Local Government Area, aside from land to which certain State Environmental Planning Policies apply.

Relevant Policies include State Environmental Planning Policy (Western Sydney Employment Area) 2009 (the WSEA Policy), which covers land including the subject site.

Relevant aspects of the WSEA Policy are addressed in the section following.

5.6 State Environmental Planning Policy (Western Sydney Employment Area) 2009

As noted in section 5.5 above, and as further described below, State Environmental Planning Policy (Western Sydney Employment Area) 2009 is relevant to the proposal the subject of this report.

WSEA Policy Aims

The WSEA Policy aims to protect and enhance the land to which the Policy applies, including the subject site, for employment purposes.

The particular aims of the WSEA Policy are as follows:

a) *to promote economic development and the creation of employment in the Western Sydney Employment Area by providing for development including major warehousing, distribution, freight transport, industrial, high technology and research facilities,*

b) *to provide for the co-ordinated planning and development of land in the Western Sydney Employment Area,*

c) *to rezone land for employment or environmental conservation purposes,*

d) *to improve certainty and regulatory efficiency by providing a consistent planning regime for future development and infrastructure provision in the Western Sydney Employment Area,*

e) *to ensure that development occurs in a logical, environmentally sensitive and cost-effective manner and only after a development control plan (including specific development controls) has been prepared for the land concerned,*

f) *to conserve and rehabilitate areas that have a high biodiversity or heritage or cultural value, in particular areas of remnant vegetation.*

The proposal is consistent with the relevant aims of the WSEA Policy, particularly in relation to promoting economic development and creating employment in the Western Sydney Employment Area.

Land to which the WSEA Policy applies

The WSEA Policy applies to the land identified on the Land Application Map.

The subject site (and adjoining land the subject of the Policy) is shown within Precinct 2 “Eastern Creek” on the Land Application Map Sheet LAP 001.

Adjoining land to the south of Precinct 2, associated with a Sydney Water Pipeline, is not covered by the Policy.

Zoning of land to which the WSEA Policy applies

For the purposes of the WSEA Policy, land is within the zones shown on the Land Zoning Map.

The subject site (and adjoining land the subject of the Policy) is shown within the IN1 “General Industrial” Zone on the Land Zoning Map Sheet LZN 001.

The objectives of the General Industrial zone are:

- *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.*

The proposal is consistent with the relevant objectives of the General Industrial zone, particularly in relation to facilitating appropriate employment-generating development and encouraging a high standard of development.

WSEA Policy Definitions

For the purposes of the WSEA Policy, the proposal is defined as being an "Industry":

> ***Industry*** *means the manufacturing, production, assembling, altering, formulating, repairing, renovating, ornamenting, finishing, cleaning, washing, dismantling, transforming, processing or adapting, or the research and development of any goods, chemical substances, food, agricultural or beverage products, or articles for commercial purposes, but does not include extractive industry or a mine.*

Industries (other than offensive or hazardous industries) are permitted with consent in the General Industrial Zone, as are "Warehouse or distribution centres" of the like already approved / existing on the subject site.

As described in section 4.10 of this report, the proposal will not have impacts nor pose risks of a nature that would lead to its definition as an "offensive industry" or "hazardous industry".

Relevant definitions follow for reference purposes:

> ***Offensive industry*** *means any development for the purpose of an industry that would, when the development is in operation and when all measures proposed to reduce or minimise its impact on the locality have been employed (including, for example, measures to isolate the development from existing or likely future development on other land in the locality), emit a polluting discharge (including, for example, noise) in a manner that would have a significant adverse impact in the locality or on the existing or likely future development on other land in the locality.*
>
> ***Hazardous industry*** *means development for the purpose of an industry that, when the development is in operation and when all measures proposed to reduce or minimise it impact on the locality have been employed (including, for example, measures to isolate the development from existing or likely future development on other land in the locality), would pose a significant risk in the locality:*
>
> *a) to human health, life or property, or*
>
> *b) to the biophysical environment.*

WSEA Policy Consent Authority

For the purposes of the WSEA Policy, the consent authority for development of land to which the Policy applies is, subject to the Act, the Council of the local government area in which the land is situated.

As described in section 5.4 of this report, the proposal is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979*.

Consequently, the Minister for Planning is the consent authority.

Requirement for development control plans

Except in such cases as the Director-General may determine by notice in writing to the consent authority or as provided by clause 19, the consent authority must not grant consent to development on any land to which the WSEA Policy applies unless a development control plan has been prepared for that land.

In the case of the proposal, the clause 19 proviso applies as described below.

Existing precinct plans under SEPP 59

In accordance with clause 19 of the WSEA Policy, the consent authority may grant consent to development on any land to which the policy applies without a development control plan being prepared for that land if the consent authority is satisfied that an existing precinct plan applies to that land.

The term "existing precinct plan" means certain Precinct plans prepared under State Environmental Planning Policy No 59 – Central Western Sydney Economic and Employment Area and in force as at commencement of the WSEA Policy.

Relevant precinct plans include the Eastern Creek Precinct Plan (Blacktown LGA), approved March 2004 (stages 1 and 2) and December 2005 (stage 3), which covers land including the subject site.

In determining a development application that relates to any land to which an existing precinct plan applies, the consent authority is to take the existing precinct plan into consideration.

Relevant aspects of the Eastern Creek Precinct Plan are addressed in section 5.7 of this report.

WSEA Policy Principal development standards

Part 5 of the WSEA Policy contains the principal development standards.

Comments are provided in response to each standard.

Ecologically sustainable development:

The consent authority must not grant consent to development on land to which the Policy applies unless it is satisfied that the development contains measures designed to minimise:

c) the consumption of potable water, and

d) greenhouse gas emissions.

Comment:

As described previously, the proposed development forms part of wider CCA initiatives intended to improve the sustainability of their product packaging.

As discussed in section 4.8, the benefits arising from the implementation of new technology associated with blow-fill bottle manufacture from preforms include reductions in:

– raw material requirements,

– energy requirements per unit,

– water usage, and

– transport costs.

Minimal potable water is utilised in the production process.

As outlined in section 4.8, it is estimated that a 5-10% energy saving will be achievable in the preform manufacture process.

The use of latest technology injection moulding machines will produce preforms faster with a lower energy requirement per unit.

Height of buildings:

The consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that:

a) building heights will not adversely impact on the amenity of adjacent residential areas, and

b) site topography has been taken into consideration.

Comment:

There are no adjacent residential areas.

Nevertheless, building height is consistent with existing and proposed / approved development on the subject site and within the broader industrial estate (refer section 2.5).

Site levels have largely / essentially been determined due to prior site development.

Rainwater harvesting:

The consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that adequate arrangements will be made to connect the roof areas of buildings to such rainwater harvesting scheme (if any) as may be approved by the Director-General.

Comment:

A stormwater management plan report has been prepared for the proposed development as described in section 4.6.

The proposed manufacturing facility will be integrated with the existing distribution centre infrastructure.

Development adjoining residential land:

(1) This clause applies to any land to which this Policy applies that is within 250 metres of land zoned primarily for residential purposes.

(2) The consent authority must not grant consent to development on land to which this clause applies unless it is satisfied that:

a) wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity, and

b) goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential buildings and associated land, and

c) *the elevation of any building facing, or significantly exposed to view from, land on which a dwelling house is situated has been designed to present an attractive appearance, and*

d) *noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised, and*

e) *the development will not otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting or the like, and*

f) *the development will provide adequate off-street parking, relative to the demand for parking likely to be generated, and*

g) *the site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.*

Comment:

The subject site is not within 250 metres of land zoned primarily for residential purposes.

Nevertheless the design of the proposed development is generally consistent with the intent of the above-listed requirements.

Development involving subdivision:

The consent authority must not grant consent to the carrying out of development involving the subdivision of land unless it has considered the following:

a) *the implications of the fragmentation of large lots of land,*

b) *whether the subdivision will affect the supply of land for employment purposes,*

c) *whether the subdivision will preclude other lots of land to which this Policy applies from having reasonable access to roads and services.*

Comment:

The proposed development does not involve the subdivision of land.

Public utility infrastructure:

(1) The consent authority must not grant consent to development on land to which this Policy applies unless it is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when required.

(2) In this clause, public utility infrastructure includes infrastructure for any of the following:

a) *the supply of water,*

b) *the supply of electricity,*

c) *the supply of natural gas,*

d) *the disposal and management of sewage.*

(3) This clause does not apply to development for the purpose of providing, extending, augmenting, maintaining or repairing any public utility infrastructure referred to in this clause.

Comment:

Public utility infrastructure essential for the proposed development is available via existing connections to the distribution centre site.

Arrangements have been made to upgrade the supply of electricity to satisfy the demands of the manufacturing process.

Capacity exists within trunk infrastructure servicing the industrial estate associated with the Eastern Creek zone substation.

Development on or in vicinity of proposed transport infrastructure routes:

(1) This clause applies to any land to which this Policy applies that is situated on or in the vicinity of a proposed transport infrastructure route as shown on the Transport and Arterial Road Infrastructure Plan Map.

(2) The consent authority must refer to the Director-General of the Department of Planning any application for consent to carry out development on land to which this clause applies.

(3) The consent authority must, before determining any such development application, consider any comments made by the Director-General as to the compatibility of the development to which the application relates with the proposed transport infrastructure route concerned.

Comment:

The subject site is not situated on or in the vicinity of a "Proposed Road" as shown on Transport and Arterial Road Infrastructure Plan Map sheet TA 001.

WSEA Policy Miscellaneous provisions

Part 6 of the WSEA Policy contains miscellaneous provisions, most of which do not apply to the proposed development.

Applicable provisions are addressed below.

Industrial Release Area:

satisfactory arrangements for the provision of regional transport infrastructure and services

Comment:

The subject site is included within an "Industrial Release Area" as shown on Industrial Release Area Map sheet IRA 001.

As noted previously, a Developer Agreement already exists with respect to obligations for the development of the industrial estate.

Design Principles:

In determining a development application that relates to land to which the WSEA Policy applies, the consent authority must take into consideration whether or not:

(a) the development is of a high quality design, and

(b) a variety of materials and external finishes for the external facades are incorporated, and

(c) high quality landscaping is provided, and

(d) the scale and character of the development is compatible with other employment-generating development in the precinct concerned.

Comment:

The proposal will be of a high quality design consistent with the existing CCA distribution centre on the subject site.

Summary Comment

As described above, the proposal satisfies the relevant provisions of State Environmental Planning Policy (Western Sydney Employment Area) 2009.

5.7 Eastern Creek Precinct Plan (Stage 3)

As highlighted in section 5.6 of this report, the consent authority must take the Eastern Creek Precinct Plan into consideration in determining the subject development application.

The Eastern Creek Precinct Plan – Stage 3 (dated 14 December 2005) outlines the provisions relating to development of the Stage 3 Release Area within the Eastern Creek Precinct of State Environmental Planning Policy No. 59 – Central Western Sydney Economic and Employment Area.

It is noted that there is considerable overlap between the content of the WSEA Policy as described above and of the Precinct Plan.

Land to Which the Precinct Plan Applies

Release Area 3 of the Eastern Creek Precinct covers an area of approximately 600 hectares, and is bound by the M4 Motorway and the Lot 11 Precinct to the north, Wallgrove Road to the east, the Sydney Water Pipeline to the south, and the Transgrid transmission easements to the west.

The subject site and surrounding land to the north of the Sydney Water Pipeline are included within the Eastern Creek Precinct Plan Stage 3 Release Area.

Precinct Plan Purpose

The Precinct Plan aims to reinforce the provisions of SEPP 59, by providing guidelines for the detailed planning and development of the Eastern Creek Precinct.

The objectives of the Precinct Plan are to:

a) *promote economic growth and employment opportunities within Central Western Sydney; and*

b) *ensure the orderly provision of infrastructure and services; and*

c) *provide a safe and efficient stormwater management system that minimizes stormwater impacts on the environment; and*

d) *ensure ecologically sustainable development that takes an active approach to anticipating and preventing damage to the environment; and*

e) *minimize the impact of development on areas of high biological diversity, archaeological significance, and heritage; and*

f) *ensure the traffic and public transport needs for the Precinct are achieved; and*

g) *ensure the best possible urban design outcomes are achieved; and*

h) *ensure the community service needs of the working population are met; and*

i) *allow for the provision of adequate open space for the use and enjoyment of the working population; and*

j) *ensure the provision of high quality landscaping throughout the Precinct.*

Comment:

The proposal is consistent with the relevant objectives of the Precinct Plan, particularly in relation to promoting economic growth and employment opportunities within Central Western Sydney, and ensuring appropriate design and development outcomes.

Precinct Plan Structure

The Precinct Plan provisions are organized into 15 sections.

Most of the provisions are not directly relevant / applicable to the proposal in that they cover matters that were addressed in the original development application and subsequent consent approval for industrial estate and site development, as described in the table following.

Precinct Plan Section	Response / Comment
2. Development Concept	Concept matters are not directly applicable to the proposal as they were largely addressed during prior industrial estate and/or subject site approvals and development. Nevertheless, the proposal does not compromise Precinct Plan development concept intentions.
3. Economic Development and Employment	Economic Development and Employment matters are not directly applicable to the proposal as they were largely addressed during prior industrial estate and/or subject site approvals and development. However, the proposal is consistent with the relevant objectives contained in section 3.4.1 of the Eastern Creek Precinct Plan.
4. General Services	Matters relating to the provision of general (water, sewerage, power, telecommunications and gas supply) services were largely addressed during prior industrial estate and/or subject site approvals and development. In general terms, the proposal includes connection to / integration with existing site services. However, particular consideration is being given to augmenting the existing site power supply to meet additional manufacturing process demands.
5. Stormwater Management	Matters relating to Stormwater Management, including flooding, were largely addressed during prior industrial estate and/or subject site approvals and development. In general terms, the proposal includes connection to / integration with the existing estate / site stormwater management system.
6. Extraction and Rehabilitation	Extraction and Rehabilitation matters are not directly applicable to the proposal as they were addressed during prior industrial estate and/or subject site approvals and development.
7. Environmental Management	Matters relating to Environmental Management were addressed during prior industrial estate and/or subject site approvals and development. In general terms, the proposal is to be integrated with the existing distribution centre development. Nevertheless, the proposal has been designed to address relevant Precinct Plan objectives / controls to the extent possible within the limitations imposed by existing site development and the requirements of the manufacturing process. Particular consideration is being given to maximising energy efficiency and water conservation, avoiding adverse environmental impacts from air pollutants, and noise, and reducing process waste.

8. Biodiversity	Biodiversity matters are not directly applicable to the proposal as they were addressed during prior industrial estate and/or subject site approvals and development.
9. Heritage	Non-Indigenous and Indigenous Heritage matters are not directly applicable to the proposal as they were addressed during prior industrial estate and/or subject site approvals and development.
10. Traffic and Transport	Matters relating to Traffic and Transport, including parking, were largely addressed during prior industrial estate and/or subject site approvals and development. In general terms, the proposal includes integration with existing site driveways, parking, loading, servicing and other vehicle and pedestrian movement / circulation areas.
11. Urban Design	Matters relating to Urban Design were addressed during prior industrial estate and/or subject site approvals and development. In general terms, the proposal is to be integrated with the existing distribution centre development. The new building will effectively only be wholly visible from within the subject site, particularly given local topography and adjacent development. Nevertheless the proposal has been sited and designed to address relevant Precinct Plan objectives / controls, in addition to complementing the existing distribution centre design. Issues relating to new retaining wall construction are addressed as part of the request for modifications to the current development approval. Details are provided in the accompanying report. However, relevant retaining wall design drawings are included in Appendix 13 of this report for the sake of completeness.
12. Community Services	Community services matters are not directly applicable to the proposal as they relate to broader industrial estate development.
13. Open Space	Open Space matters are not directly applicable to the proposal as they relate to broader industrial estate development.
14. Landscaping	Matters relating to Landscaping were largely addressed during prior industrial estate and/or subject site approvals and development. Minor landscape works are proposed along the rear / southern boundary of the site, generally behind the new building, as part of the request for modifications to the current development approval. Details are provided in the accompanying report. However, relevant landscape design drawings are included in Appendix 14 of this report for the sake of completeness.

Conclusion

As described above, the proposal satisfies the relevant provisions of the Eastern Creek Precinct Plan.

6 Statement of Commitments

Draft commitments arising from the assessment of project related issues follow.

Issue	Commitment
Air quality	Install an extraction system to capture the Volatile Organic Compounds (VOCs) emitted from the printing process. The extraction system will incorporate an afterburner to mitigate VOCs within the air stream, in compliance with the consultation advice received from DECCW. The extraction system will incorporate a local exhaust ventilation system for each of the five printers, all converging into one duct which will be directed through an afterburner. The design of the extraction system will consider *AS 1668 The Use of Ventilation and Air Conditioning in Buildings, Part 1 and 2*.
Greenhouse Gas	Invest in latest technology to reduce the energy requirement per unit of production.
Hazards and Risks	Store dangerous goods in accordance with relevant Australian Standards. Strict control of ignition sources, including a hot work permit system, would operate in chemical storage areas. Management practices would ensure combustible materials, such as packaging and pallets, do not accumulate within the production or storage areas.
Waste Management	General compliance with the relevant Waste Management Plan prepared by Heggies Pty Ltd during construction and operation stages as appropriate.
Stormwater Management	General compliance with relevant content within the Stormwater Management Plan prepared by Costin Roe Consulting Pty Ltd during construction and operation stages as appropriate.
Erosion & Sediment Control Plan	General compliance with the relevant Erosion & Sediment Control Plan prepared by Costin Roe Consulting Pty Ltd during construction phase as appropriate.
Noise	Ensure that any elevated / roof top air conditioning units are designed, positioned and/or shielded in such a way as to meet the project specific noise criteria.
Traffic	A Construction Traffic Management Plan will be prepared prior to the commencement of construction work. A work place travel plan will be prepared in conjunction with the commencement of operations.
Soil	General compliance with the relevant Salinity Study strategies prepared by Douglas Partners Pty Ltd during the construction stage as appropriate.

7 Conclusion

This Environmental Assessment report has been prepared by Tract Consultants Pty Ltd on behalf of Goodman Property Services (Aust) Pty Ltd.

It accompanies a Goodman Property Services (Aust) Pty Ltd application (Application Number MP 10_0125) made under Part 3A of the *Environmental Planning and Assessment Act 1979*.

The application relates to the further development of the Coca-Cola Amatil Limited (CCA) distribution centre site within the M7 Industrial Estate in the Blacktown local government area.

Development and use of the land comprising the estate and of the subject site has proceeded / is proceeding generally in accordance with the original approval (Reference Number: DA-308-12-2004-i) as modified.

The proposed development primarily comprises:

– Construction of a c.11,000m^2 industrial building in two stages to house a plastics manufacturing process and associated activities including product storage; and

– Fit-out of manufacturing plant and associated equipment for use as a manufacturing facility.

The proposed plastics manufacturing facility will produce "preforms" and "closures" associated with CCA's in-house blow-fill bottling operations in Australia, New Zealand, Fiji and Papua New Guinea.

The development is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979*, in part because it has a "capital investment value" in excess of $20 million, comprising construction costs of about $8 million and fit-out costs of about $47.5 million.

The proposed manufacturing facility has been designed to integrate with existing and proposed future distribution centre operations.

As such, it will have minimal impact on those operations.

Equally, the modifications required to allow the integration will have little if any additional impact beyond the boundaries of the site, as they effectively constitute a re-organisation of existing / approved distribution centre components.

The scope of potential environmental impacts associated with the proposed manufacturing facility is minimised by virtue of the site and development location attributes, the extent and nature of existing and approved development, and the nature of the proposed manufacturing process and the related hazards and emissions profile.

In this context, relevant assessments have identified that the proposed development will have only minor if any impacts beyond the boundaries of the site.

The project also has broader sustainability including environmental benefits when considered in association with CCA's move to in-house blow-fill bottle manufacture.

These benefits include reductions in raw material requirements, energy requirements per unit and associated transportation requirements.

In addition, the proposed development is generally consistent with NSW Government and Blacktown City Council intentions for the Western Sydney Employment Area / Eastern Creek Precinct Plan area.

The accompanying application is therefore recommended for approval as part of the further staged development of CCA's Eastern Creek distribution centre site.

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