

**MAJOR PROJECT ASSESSMENT:
Coca-Cola Amatil Preform and Closure
Manufacturing Facility**



Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

April 2011

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EXECUTIVE SUMMARY

Goodman International Pty Ltd (Goodman) proposes to establish a Preform and Closure Manufacturing Facility, with associated infrastructure on a 15ha site at Eastern Creek, in the Blacktown local government area. The proposed site is also located within the Eastern Creek Precinct, of the Western Sydney Employment Area (WSEA).

The facility would be operated by Coca-Cola Amatil (CCA) as part of their soft drink manufacturing operations. The proposal would enable CCA to send the manufactured preforms and closures to their existing operations in Australia and the Pacific where they can be directly converted from preforms to bottles at CCAs purpose built bottle sites (such as the Northmead facility approved by the Minister). This process is referred to as blow-fill operations.

The project has a total capital investment value (CIV) of \$48 million and would generate up to 50 jobs during construction and 16 full jobs during operations.

The proposal constitutes a 'major project' under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), and consequently the Minister is the approval authority for the project.

During the exhibition period the Department received 3 submissions on the proposal, all from Government authorities. The submissions raised a range of issues about the project, primarily concerning parking, traffic manoeuvrability on site and potential impacts to the existing public infrastructure located adjacent the subject site.

The Department has assessed the Environmental Assessment and submissions on the project, in accordance with the objects of the EP&A Act.

The assessment found that the main issues associated with the project relate to traffic, soil and water management. The Department has assessed these impacts and considers that they can be adequately mitigated and/or managed to ensure an acceptable level of performance and has recommended a range of conditions to ensure this occurs.

The Department is satisfied that the project is consistent with the State Plan, Metropolitan Strategy and the broader strategic planning objectives for the area, including the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP).

In addition, the Department's assessment recognises the significance and need for the project in terms of promoting sustainability and reducing greenhouse emissions, as it would allow CCA to produce its own bottles and lids associated with CCAs in house blow fill technology rather than import from other suppliers. The aim of this new technology is to produce the lightest PET plastic bottles in Australia that are fully recyclable and will contain up to 20 percent recycled material.

In summary, the Department is satisfied that the project offers significant social and economic benefits for the Western Sydney and wider community and is therefore in the public interest.

Consequently, the Department recommends that the Preform and Closure Manufacturing Project be approved, subject to conditions.

1. BACKGROUND

1.1 Project Background

Since 1999 the Western Sydney region has been identified as a strategically important area for employment use, due to its proximity to major regional road infrastructure. The importance of the region is reflected in the expansion of the employment area through the gazettal of the *State Environmental Planning Policy (Western Sydney Employment Area)* (WSEA SEPP) in 2009. The area spans four local government areas - Fairfield, Penrith, Blacktown and Holroyd. The WSEA is located near the intersection of the M4 and M7 motorways, is 800 hectares in area and includes 10 Precinct areas (see Figure 1) of zoned employment lands such as the Eastern Creek (Precinct 2); Erskine Park (Precinct 7); and Ropes Creek (Precinct 6) precincts.

The development of a number of precincts within the WSEA is well advanced. The Minister has approved a number of developments within Eastern Creek and Erskine Park, including warehousing and distribution centres, manufacturing facilities and data facilities. In addition Concept Plan applications for the Huntingwood West site, Minchinbury Employment Park and Oakdale Central have also been approved by the Minister.

The proposed development site is located within the proposed M7 Business Hub, within the Stage 3 Release Area in the Eastern Creek Precinct established under SEPP 59 (see Figure 1). The M7 Business Hub, owned and developed by Goodman International Pty Ltd (Goodman), is around 150 ha in area and contains a number of previously approved warehouse and distribution centres.

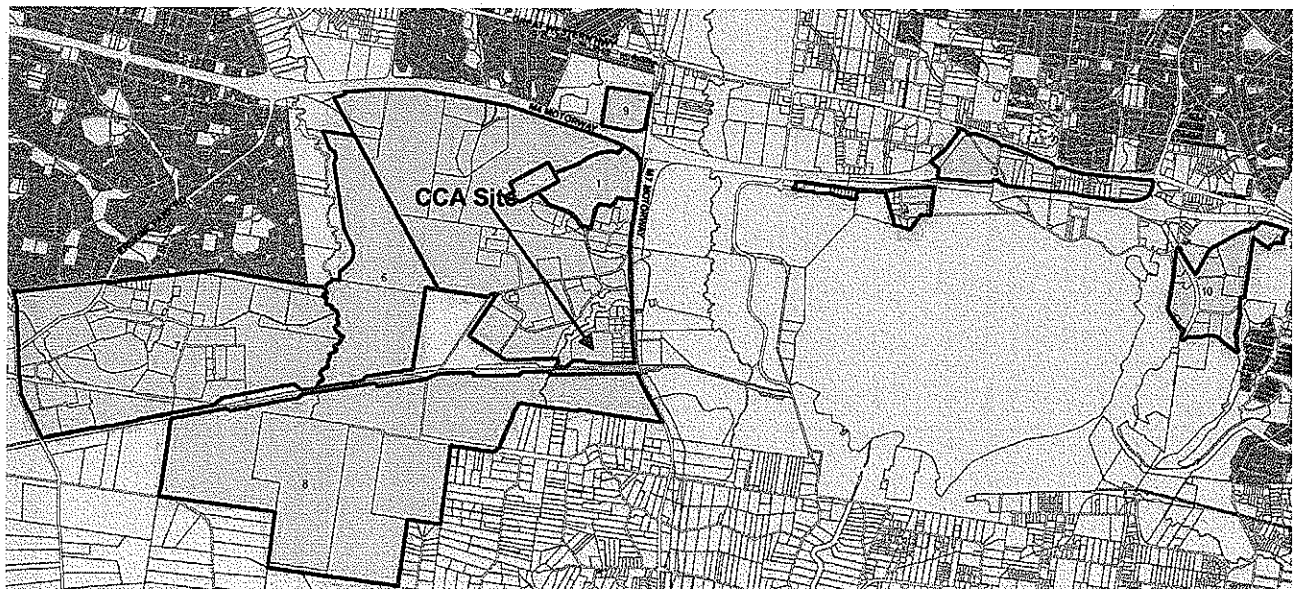


Figure 1: Proposed Project Site: WSEA

The site is currently used as a warehouse and distribution centre by Coca-Cola Amatil (CCA) for the purpose of receiving, storing and supplying beverages and related produce. The warehouse and distribution centre was approved by the then Minister in June 2005.

Since development consent was granted, a number of modifications have also been approved, including amendments to the subdivision plan and site layout; construction of a new cold storage building; amendments to the gatehouse roofline; new solar roof panels on the main distribution centre building; and the relocation of the cold storage building (see Figure 7 and 8). All of which are operated by CCA.

Goodman proposes to further develop the CCA's operations to include a preform and closures manufacturing facility, for use by CCA on this site.

Recently, a modification (308-12-2004-i-MOD 7) was approved to relocate the cold store building to the western end of the facility, in order to facilitate the development of the manufacturing facility, the

subject of this proposal. The manufacturing facility is to be located in the south eastern corner of the site, extending across existing paved areas into the undeveloped area previously intended for the cold store building.

1.2 Project Setting

The proposed site has an area of around 15 hectares and is located on Lot 251 in DP 1082988, at 9 Roussell Road, Eastern Creek. The site forms part of the M7 Business Hub, which is land comprising the existing CCA distribution centre. The M7 Business Hub is bound by Old Wallgrove Road to the north and west, Wallgrove Road to the east and the Sydney Water pipeline to the south. In addition to the subject proposal, there are a number of developments previously approved and predominantly constructed within the M7 Business Hub, including the Coles distribution centre and Hewlett Packard data storage facility.

Also located to the south is a corridor of land which has been retained as a riparian corridor along Reedy Creek. Overhead high voltage power lines and associated towers extend along the riparian zone.



Figure 2: Regional Context

The nearest residential suburbs are Minchinbury to the immediate north of the M4 Motorway and Erskine Park to the north of the Erskine Park Employment Area. The nearest residence is more than 500 metres to the south of the site.



Figure 3: Local Context

The roads and estate stormwater infrastructure works, utilities and services (including water, sewer, electricity, gas and telecoms) have been completed for the M7 Hub. Goodman International Pty Ltd has entered into a Planning Agreement with the Minister for Planning, which covers all required developer contributions for the M7 Business Hub, including the CCA site.

2. PROPOSED PROJECT

2.1 The Proposed Project

The application has two related proposals:

1. the proposed Preform and Closure Manufacturing Facility project; and
2. the approved Distribution Centre Modification (DA 308-12-2004-i-MOD 7).

The current proposal seeks permission to further develop part of the distribution centre site for the manufacturing facility to produce preforms and closures. Preforms are pre-moulded plastic bottle casts that are used in CCA's in house blow fill operation to produce plastic beverage containers (bottles), and closures are lids used for the bottles (see Figures 4 and 5 below).

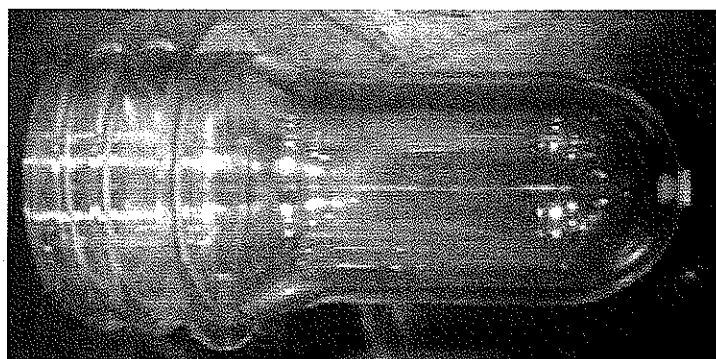


Figure 4: Example photograph of PET bottle preform



Figure 5: Example photograph of bin packed with preforms

Currently, CCA purchase plastic beverage containers from other entities for filling, prior to dispatch to customers. With a commitment to sustainability, CCA has introduced new technologies to streamline and integrate production in house. New blow fill technology installed at existing CCA facilities, such as their Northmead plant, enables CCA to design and manufacture PET plastic beverage containers from performs with the aim of making them the lightest PET plastic bottles in Australia.

The lighter weight PET bottles are fully recyclable and will also contain up to 20 percent recycled material comprising both pre and post consumer resin. The proportion of recycled content, including pre and post consumer resin may be increased in the future.

The proposed Preform and Closure Manufacturing Facility project seeks approval for:

- minor earthworks on site;
- establishment of the warehouse building and associated amenities;
- construction of hardstand areas;
- construction of a fire access road;
- fit-out of a manufacturing plant and associated equipment; and
- augmentation to existing infrastructure and services.

The major components of the project are summarised in Table 1 and depicted in Figure 6. The project is described in full in the Environmental Assessment (EA), attached as Appendix E.

Table 1: Major components of the Development

Aspect	Description
Project summary	The project involves the staged construction, use and fit-out of a 10,800sqm purpose-built manufacturing / industrial facility for Coca-Cola Amatil Pty Ltd at the existing Coca-Cola Amatil Distribution Centre, in the M7 Business Hub, Eastern Creek.
Site preparation works	Minor earthworks and site preparation works would be undertaken, including the removal of existing hardstand areas.
Construction	<ul style="list-style-type: none"> • Construction of a 10,800m² industrial building to house the manufacturing process and associated activities including product storage; • Construction of hardstand areas, including vehicle movement areas primarily associated with the docks at the western end of building and the new fire access road; and • Construction of a fire access road between the building and the eastern and southern site boundaries.
Development specifications	<ul style="list-style-type: none"> • Setbacks: 2m from southern boundary • Height: ridge height of 12.2m high, with the exception of high bay component which is 17.4m high
Access and Parking	<ul style="list-style-type: none"> • Heavy vehicles would access the site via the existing security controlled access off Roussell Road.

Aspect	Description
	<ul style="list-style-type: none"> The car park is accessed off Roussell Road via a separate access point. The proposed development would require the use of approximately 16 spaces of the existing 200 spaces, already provided for the site. Pedestrian access to the new facility would be via extension of the existing pedestrian walkways through the site.
Fit-out	<ul style="list-style-type: none"> Fit-out of manufacturing plant and associated equipment. Fit out of office and staff amenities.
Infrastructure	<ul style="list-style-type: none"> Connection to existing site services. Augmentation of power services to the site/building.
Capital Value	\$48 million
Employment	The facility will employ 16 people following construction
Hours of operation	24 hour operations

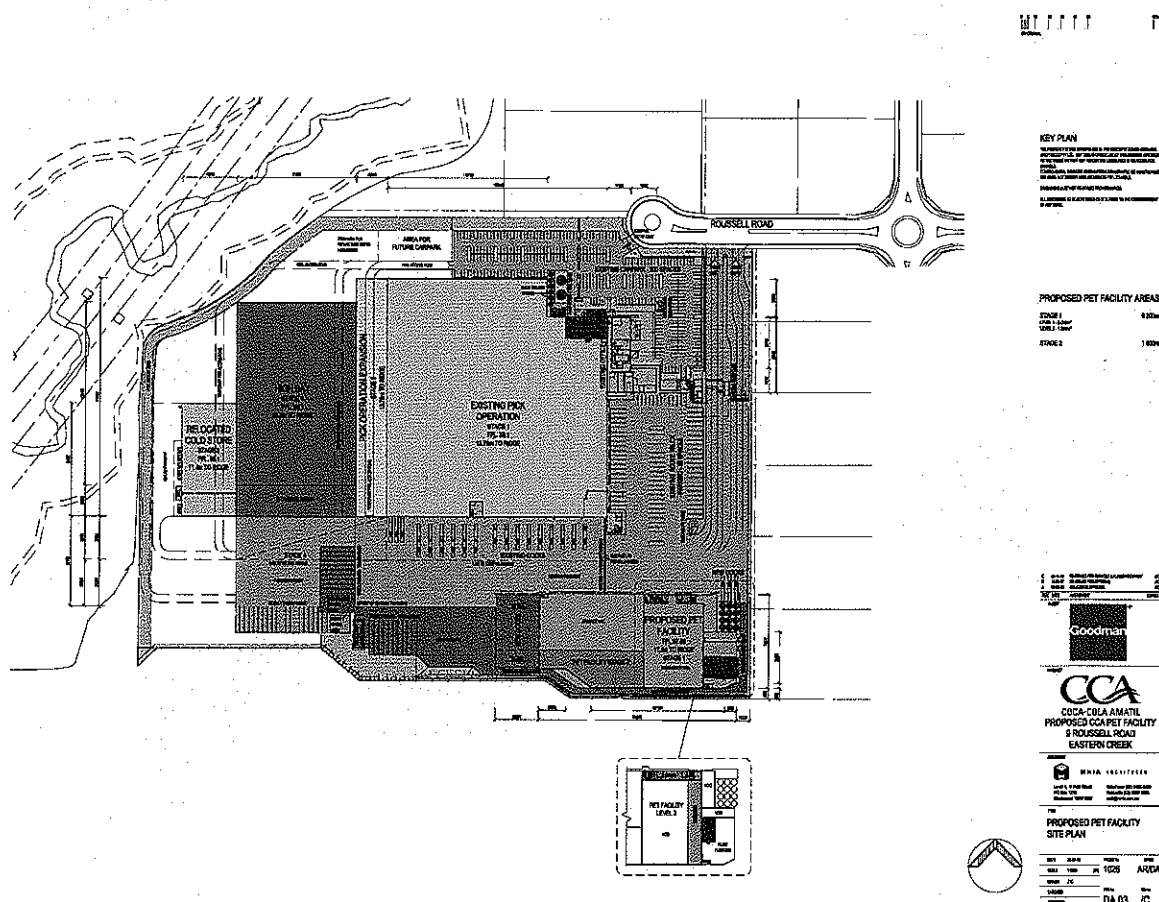
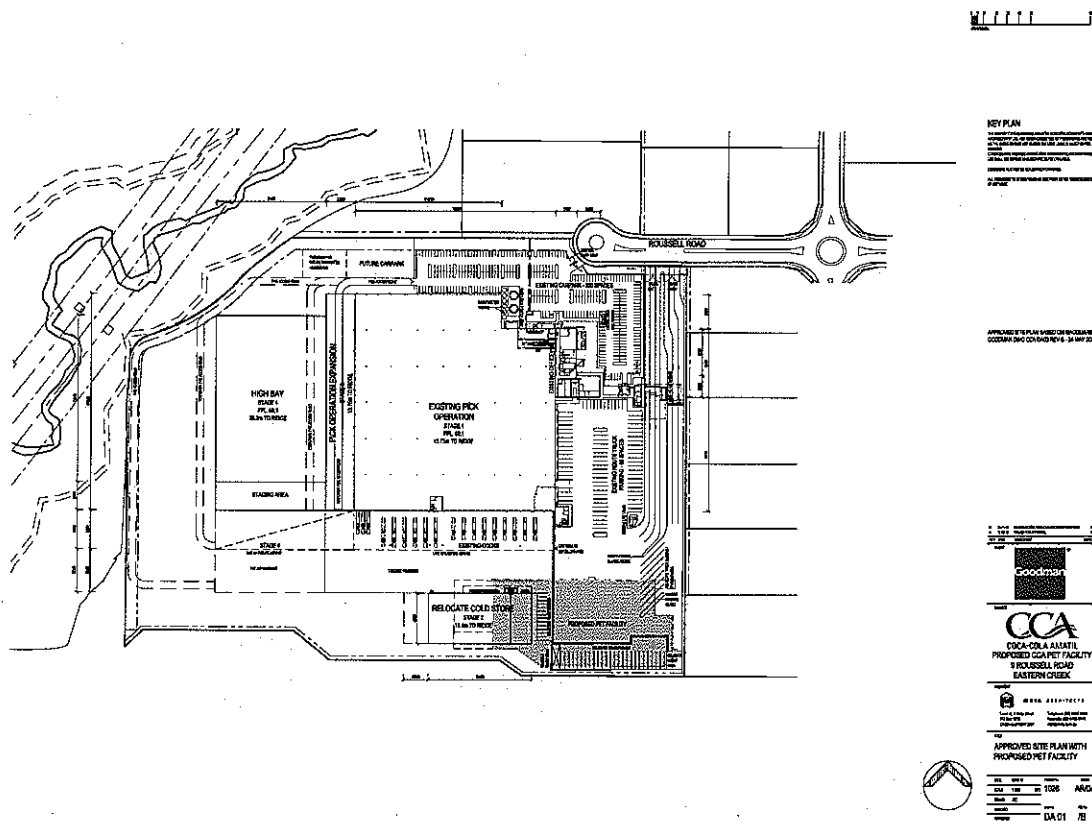
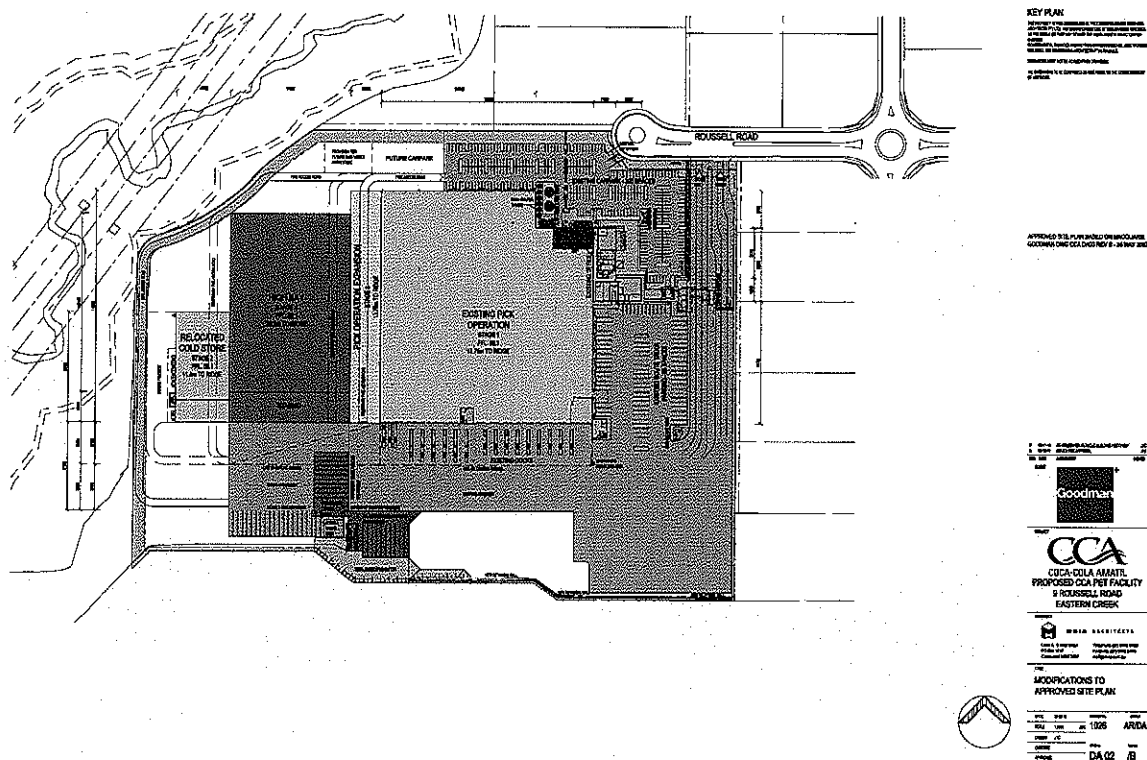


Figure 6: Site layout and proposed manufacturing facility

2.2 Approved Modification

In order to facilitate the development of the manufacturing facility, a modification was approved for the relocation of the cold storage facility and associated works. The approved Modification allows for the:

- relocation of the approved cold store to the western end of the site;
- relocation of truck parking, including provision for temporary position;
- relocation of truck wash facilities and waste area to temporary position; and
- construction of new retaining wall including landscaping to enable fire access around the proposed facility (see Figure 7 and 8 below).



Figures 7 and 8 above show the modifications approved to integrate the current proposed manufacturing facility with the distribution centre.

2.3 Manufacturing Process

The manufacturing process entails converting polyethylene terephthalate (PET) and high density polyethylene (HDPE) resin pellets into preforms and closures respectively. Resin pellets are produced by a number of suppliers from around the world, including Australia, Indonesia, South Korea, Thailand, USE and India. Once received onsite the manufacturing process involves:

- storing the Resin Pellets in resin silos ready for use;
- transporting PET resin pellets into the Blending Room where the resin is blended with small amounts of recycled resin combined with a small amount of plastic waste produced during the start-up of the process.
- transporting the PET Resin Pellets to the Dryer Room, once blended.
- heating inside a dryer, the resin up to 170°C, for a period of 4 to 6 hours.
- feeding the hot PET Resin Pellets into the preform injection machine where the pellets are melted with heat and pressure into molten PET.
- sending the PET Resin into a steel mould to produce PET preforms.
- sending the preforms to the warehouse conveyor.
- loading closures requiring printing into the closure printing machines where logos are printed onto the surface of the closures.
- drying of the printed closures before transferring them to the warehouse conveyor.

3. STATUTORY CONTEXT

3.1 Major Project

The proposal is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), because it is development for the purpose of a storage centre with a capital investment value of more than \$30 million. Consequently, the Minister for Planning is the approval authority for the project.

On 5 August 2010, the Executive Director, Major Projects Assessment, on behalf of the Minister for Planning formed the opinion that the project was a "Major Project" for the purposes for Part 3A of the EP&A Act.

As the proposal involved development with less than 25 public submissions, the Director General may determine the carrying out of the project under the Minister's delegation of 25 January 2010.

3.2 Permissibility

The site is zoned IN1-General Industrial under the WSEA SEPP. Development for the purposes for storage and distribution centres is permissible, with consent, in this zone.

3.3 Exhibition and Notification

Under Section 75(3) of the EP&A Act, the Director-General is required to make the Environmental Assessment (EA) of a project publicly available for at least 30 days.

After accepting the EA for the project, the Department:

1. made it publicly available from 15 December 2010 until 7 February 2011:
 - on the Department's website, and
 - at the Department's Information Centre, Blacktown City Council's office, Fairfield City Council's office and the Nature Conservation Council;
2. notified relevant State government authorities, Blacktown City Council and Fairfield City Council by letter;
3. notified surrounding landowners by letter; and

4. advertised the exhibition in the Blacktown Advocate.

This satisfies the requirements in Section 75H (3) of the EP&A Act.

During the assessment process the Department also made a number of documents available for download on the Department's website. These documents included the:

- project application;
- Director-General's environmental assessment requirements;
- EA;
- Submissions; and
- Response to Submissions report (RTS).

3.4 Environmental Planning Instruments

Under Section 75I of the EP&A Act, the Director-General's report is to include a copy of or reference to the provisions of any:

- *State Environmental Planning Policy (SEPP)*, that substantially govern the carrying out of the project; and
- environmental planning instrument that would (but for Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project.

The Department has considered the project against the relevant provisions of several environmental planning instruments (including Major Development SEPP, Infrastructure SEPP, WSEA SEPP, and the *Blacktown Local Environmental Plan 1988*). The Department is satisfied that, subject to the implementation of the recommended conditions of approval, the proposal is generally consistent with the aims and objectives of these instruments (see Appendix C).

State Environmental Planning Policy (Western Sydney Employment Area) 2009

The objectives of the IN1 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 subject site is currently used for the purpose of a warehouse and distribution centre which is identified as development that is permissible with development consent within this zone.

The Department considers that the manufacturing of performs and closures for soft drink bottles at the existing CCA distribution facility provides better sustainability outcomes than purchasing plastic beverage containers from other entities. The new blow fill technology installed at Northmead and other plants has the potential to streamline and integrate production processes in house and reduce environmental impacts such as carbon footprints and greenhouse gases that are associated with importation and transportation of the products.

In addition, the new technologies allows CCA to design and manufacture PET plastic that is made from fully recycled materials and is the lightest in Australia.

The Department further considers that the proposed manufacturing facility would not be inconsistent with any of the objectives of the SEPP (Western Sydney Employment Area) 2009

3.5 Objects of the Environmental Planning and Assessment Act 1979

The Minister is required to consider the objects of the EP&A Act when he makes decisions under the Act. These objects are detailed in Section 4 of the Act, and include:

The objects of this Act are:

- (a) *to encourage:*
 - (i) *the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
 - (ii) *the promotion and co-ordination of the orderly and economic use and development of land,*
 - (iii) *the protection, provision and co-ordination of communication and utility services,*
 - (iv) *the provision of land for public purposes,*
 - (v) *the provision and co-ordination of community services and facilities, and*
 - (vi) *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
 - (vii) *ecologically sustainable development, and*
 - (viii) *the provision and maintenance of affordable housing, and*
- (b) *to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) *to provide increased opportunity for public involvement and participation in environmental planning and assessment.'*

The objects of most relevance to the Minister's decision on whether or not to approve this project are those under Section 5(a)(i), (ii), (iii), (v), (vi) and (vii).

With respect to ecologically sustainable development (ESD), the EP&A Act adopts the definition in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD 'requires the effective integration of economic and environmental considerations in decision-making processes' and that ESD 'can be achieved through' the implementation of the principles and programs including the precautionary principle, the principle of inter-generational equity, the principle of conservation of biological diversity and ecological integrity, and the principle of improved valuation, pricing and incentive mechanisms. In applying the precautionary principle, public decisions should be guided by careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment and an assessment of the risk-weighted consequences of various options.

The Department has fully considered the objects of the EP&A Act, including the encouragement of ESD, in its assessment of the project application. The Department considers that the manufacturing of performs and closures at the existing distribution facility promotes ESD and would will reduce greenhouse gas emissions that would be associated with importing the beverage containers from other sources. This is consistent with ESD principles.

3.6 Statement of Compliance

Under Section 75I of the EP&A Act, the Director-General's report is required to include a statement relating to compliance with the environmental assessment requirements with respect to the project.

The Department is satisfied that the environmental assessment requirements have been complied with.

3.7 Strategic Planning

Strategic Objectives

The key strategic planning instruments governing the area include:

- the State Plan;
- the Metropolitan Plan; and
- the *State Environmental Planning Policy (Western Sydney Employment Area) 2009*.

State Plan

The State Plan provides priorities for Government action for the State of NSW. In relation to the western Sydney region, the State Plan seeks to improve access to employment lands, simplify

planning processes and enhance transport infrastructure particularly around employment lands. The western Sydney region is a major contributor to the economic output of NSW and the provision of jobs closer to home for the people of western Sydney is seen as a key objective for the area. The Department is satisfied that the proposal is consistent with the objectives of the State Plan.

Metropolitan Plan

The Metropolitan Plan presents a plan for sustainable growth in the Sydney region until 2036. The Metropolitan Plan sets out key aims for employment, housing, infrastructure and service provision. One of the objectives of the strategy is to protect and enhance the WSEA.

The broad aims of the Plan are to be implemented through ten sub-regional plans, including the Sydney North West Subregional Strategy which covers the project site. In relation to economic and employment growth, the sub-regional plan seeks 130,000 additional jobs to protect and enhance strategic employment land in the North West.

The proposed Preform and Closure manufacturing facility is expected to provide 16 jobs during operations. The provision of high employment generating development is consistent with the objectives for the area and represents an appropriate use of strategically located employment land. The proposal would assist in achieving employment targets identified in the Metropolitan Plan and Sydney North West Subregional Strategy. Further, the proposal incorporates adequate contributions for development of infrastructure and services which is a key strategic objective for the area.

The Department is satisfied that the proposal is consistent with the objectives of the Metropolitan Plan.

WSEA SEPP

The WSEA covers the area of central western Sydney centred on the intersection of the M7 and M4 motorways, identifying ten precinct areas including the Eastern Creek Precinct (see Figure 1 - Precinct 2), of which this proposal forms a part.

The Minister and Council have approved a number of other developments within Eastern Creek and Erskine Park, including warehousing and distribution centres, data storage centres, manufacturing facilities and quarries.

The Department is satisfied that the proposal is consistent with the objectives of the SEPP, as it would facilitate the development of land for employment generating uses and assist in coordinated development of the area. The Department is further satisfied that the development can be accommodated within the local and regional road network.

In summary, the Department is satisfied that the proposal is consistent with the objectives of the State and regional planning strategies and that suitable justification for the proposal has been provided.

Blacktown (DCP) 2006 and Employment Lands Precinct Plan (Eastern Creek Precinct)

The Blacktown DCP and the *Employment Lands Precinct Plan (Eastern Creek Precinct)*, which was originally developed under SEPP 59, provide a guide to local development controls for the area. The Precinct Plan provides detailed requirements for servicing, biodiversity, environmental management, traffic and transport and community services within the release area. It remains valid pursuant to clause 19 of the WSEA SEPP.

Development controls for industrial properties include detailed requirements for site dimensions; setbacks; site coverage; parking; vehicle access and maneuvering; and streetscape and amenity.

In general, the proposal accords with the development guidelines outlined in the Precinct Plan.

4. ISSUES RAISED IN SUBMISSIONS

4.1 Submissions

During the exhibition period, the Department received a total of 3 submissions on the project, all from public authorities.

A summary of the issues raised in submissions is provided below. A full copy of these submissions is attached in Appendix D.

Blacktown City Council, raised concerns with regards to onsite parking. SEPP 59 Eastern Creek Precinct Plan (Stage 3) provides that buildings 7,500m² or less should provide 1 space per 100m² gross floor area. This equates to an additional 87.5 spaces for the proposed development.

The Roads and Traffic Authority (RTA) raised concerns with regards to car parking, manoeuvrability of traffic including garbage trucks on site, the swept path and traffic movement directions. These issues have been resolved through recommended conditions of approval.

Sydney Catchment Authority (SCA) raised queries regarding their adjacent public infrastructure, the Warragamba Pipelines No. 1 and 2. Specifically queries relating to SCA's ability to manage and maintain the pipelines, the integrity, security and protection of the pipelines. These issues are manageable and can be resolved through recommended conditions of approval.

4.2 Response to Submissions

Goodman has provided a response to the issues raised in submissions (see Appendix C), as well as a revised Statement of Commitments for the project. These have been made publicly available on the Department's website.

The Department has considered the issues raised in submissions and Goodman's responses to these issues, in its assessment of the project.

5. ASSESSMENT

5.1 Traffic

Traffic generated from the construction and the operation of the project has the potential to impact on the safety and capacity of the surrounding road network. Key issues for consideration relate to access to the site, the capacity of Wallgrove and Roussell Roads to accommodate the additional traffic, the adequacy of internal roads and parking and the opportunity to promote sustainable transport. The location of the site and surrounding road network is illustrated by Figure 9 below. A detailed traffic impact assessment of the proposal was conducted by Colston Budd Hunt & Kafes Pty Ltd.

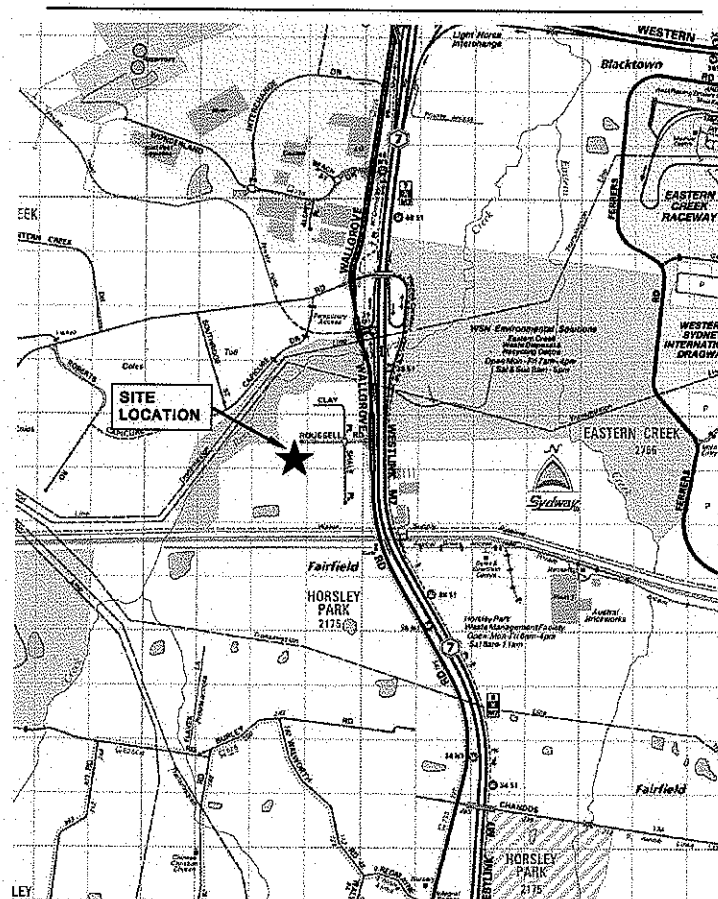


Figure 9. Site Location and Existing Road Network

Existing Road Network

Traffic generated by the proposed development would have its greatest effect during the morning and afternoon peak periods when traffic from the proposed development combines with other industrial and commuter traffic on the surrounding road network. The proposed development is expected to generate some 15 to 20 vehicle movements per hour two way during peak periods.

The result of this traffic generation is shown in table provided by Colston Budd Hunt & Kafes Pty Ltd below.

Table 2 Existing Two Way Peak Hour Traffic Flows Including Development Traffic

Table 3.2: Existing Two-Way (Sum of Both Directions) Peak Hour Traffic Flows Plus Development Traffic				
Road/Location	Morning (Vehicles /Hour)		Afternoon (Vehicles /Hour)	
	Existing	Plus Development	Existing	Plus Development
Wallgrove Road				
- north of Roussell Road	1875	+15	2080	+15
- south of Roussell Road	1835	+5	2000	+5
Roussell Road				
- west of Wallgrove Road	180	+20	200	+20
- west of Clay Place	70	+20	75	+20
Clay Place				
- north of Roussell Road	75	-	70	-
Shale Place				
- south of Roussell Road	55	-	70	-

The Department has considered the traffic report prepared by Colston Budd Hunt & Kafes and considers that the increase in traffic is minor compared to the existing levels of traffic on the existing road network. This is primarily due to the proposal having direct access to Wallgrove Road. In addition, all intersections proposed to be used would continue to operate at the same levels of service with similar delays.

Access

The site is located on the southern side of Roussell Road, west of Wallgrove Road. Other main roads in the vicinity include the M4 and M7 Motorways (see Figure 9 above). The site currently has two access roads on the south side of Roussell Road.

Site access arrangements for the proposed manufacturing facility would remain unchanged. Access to Wallgrove Road and Roussell Road has already been established as part of the existing operations on the site.

Parking would be accessed via the existing entry and exit off Roussell Road to the car park area. Access to the main loading dock and servicing areas for trucks would be via the existing security controlled entry and exit access road along the eastern boundary of the site. The truck access driveway has been designed to accommodate the largest vehicles expected to visit the site which are 19m articulated vehicles and 26m B-doubles.

Internal Circulation and Servicing

Service vehicles generated by the existing distribution centre and vehicles transporting raw material and finished preforms to and from the proposed development will range from rigid trucks, articulated vehicles and B-doubles. These service vehicles will access the site via the existing truck access onto the eastern perimeter access road. An existing gatehouse located some 90 metres into the site controls the movement of service vehicles to and from the site.

Colston Budd Hunt and Kafes Pty Ltd have assessed the circulation within the centre, and to and from the proposed development. The Department considers that the circulation pattern and truck movements are capable of accommodating all necessary movements for access and circulation through the site.

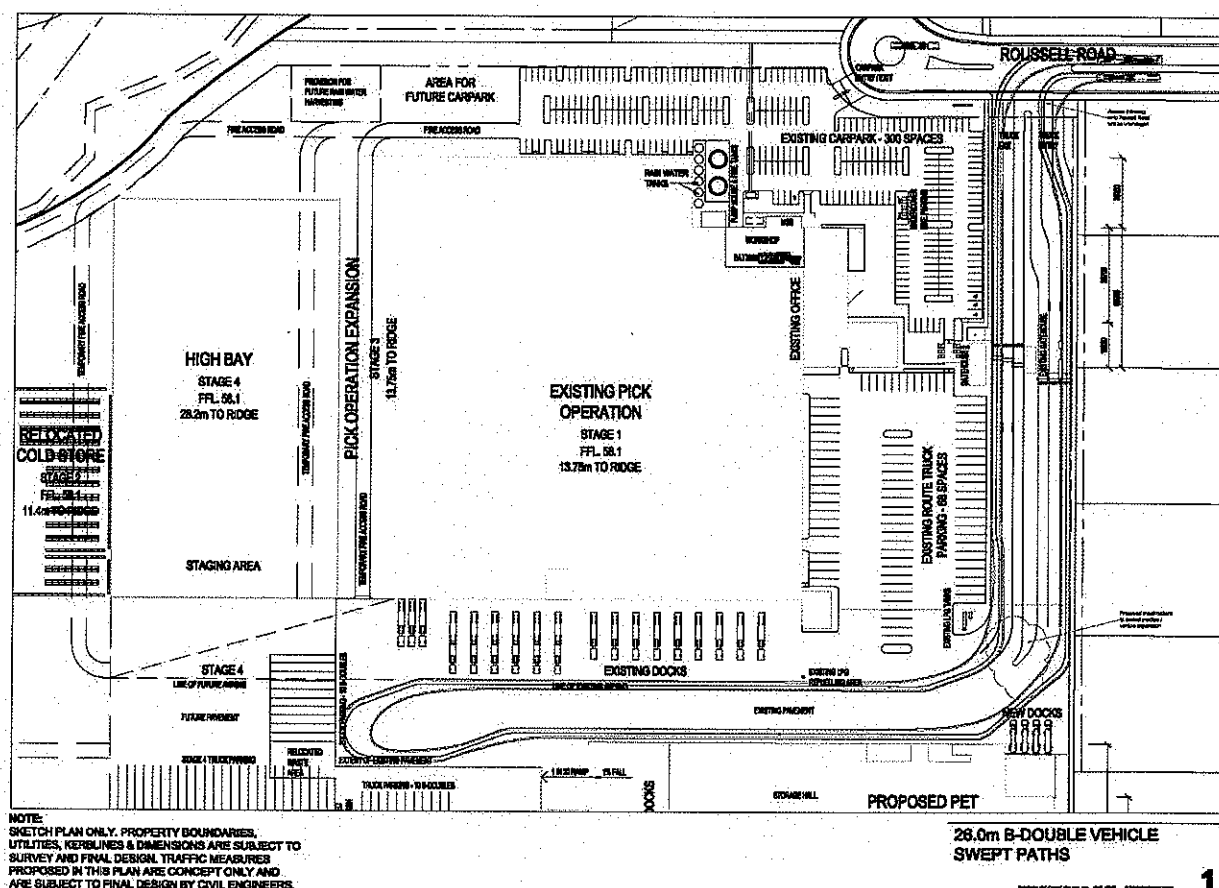


Figure 10: Truck Movement and Circulation Pattern

Parking

Blacktown City Council raised concerns regarding the parking requirements of the proposal. Council indicated that SEPP 59 – Eastern Creek Precinct Plan specifies the following requirements for the provision of on-site parking for industrial developments:

- Buildings 7,500m² or less – 1 space per 100m² GFA;
- Buildings greater than 7,500m² – 1 space per 200m² GFA only for the area in excess of 7,500m² where there is a specific end user which would not demand a higher rate and where employee parking is adequately catered for.

Council argues that the Proponent has not adequately demonstrated that the site has sufficient on site car parking for the proposed development and that an additional 87 car spaces are required to be provided for the proposal.

Goodman states that provision of additional parking spaces for the proposed development would result in an excessive parking provision as only an additional 16 staff members would be associated with the proposed manufacturing warehouse.

Colston Budd Hunt & Kafes Pty Ltd conducted a traffic survey during weekday peak periods between 5.00am and 6.00pm. The survey results indicate that existing car parking is currently 48% utilised. There is available parking of more than 155 spaces within the car park at all times. As the proposed manufacturing facility will only employ a total of 16 additional staff members it is considered that there is adequate on site parking provided for all staff. These spaces have been designed and constructed in accordance with AS2890.1-2004.

Sustainable Transport

Colston Budd Hunt & Kafes Pty Ltd. considers that the proposed development would increase employment densities and strengthen demand for existing public transport services in the area.

To encourage travel modes other than private vehicle, it is proposed to adopt a travel demand management approach through a work place travel plan to meet the needs of the site and employees. The requirements of the employees will be incorporated into the work place travel plan to encourage the use of public transport.

The Department is satisfied that the proposed development would not generate significant numbers of traffic on the local network and that the existing access arrangements are sufficient to support the proposal. Notwithstanding, the Department has recommended a condition requiring the Proponent to prepare and implement a Traffic Management Plan, to the satisfaction of the Director-General, to ensure any traffic impacts are mitigated.

5.2 Soils and Water

Stormwater Management

The site for the proposed facility already has existing stormwater infrastructure. This includes a split system, which captures roofwater and pavement water in separate areas. Stormwater from the site is discharged to Reedy Creek, via the existing stormwater system provided for the recently constructed distribution centre. A small portion of the captured roofwater is harvested and retained for re-use in the existing building for non-potable water requirements. The pavement system is drained to the site outlet points where it is directed to a stormwater detention basin at the northern end of the site.

The existing stormwater basins on-site have been constructed to the temporary sedimentation basin form required, until such time as they are to be converted to bio-retention basins in accordance with Blacktown Council guidelines, which would occur once the construction of the site is 80% complete.

The report prepared by Costin Roe Consulting indicates that as the proposal involves the reduction of the amount of hardstand area and an increase in the amount of roofed areas, the expectant pollutant loading on the existing infrastructure would be reduced. As such no additional water quality measures have been proposed.

Goodman propose to treat stormwater from hardstand and car parking drainage areas using a range of stormwater treatment measures to target pollutants present and to meet the requirements specified in Blacktown City Council's Stormwater Quality Control Policy (BCCSQCOP). A stormwater drainage plan has been developed for the site (see Figure 11).

The Department considers that the stormwater treatment measures provided by Costin Roe Consultants; and the maintenance and monitoring guidelines recommended for the ongoing review of the stormwater treatment measures proposed would be adequate to ensure that the stormwater management systems on-site are capable of supporting the proposed manufacturing facility. Notwithstanding, the Department has included a condition, including the requirement for Goodman to meet the proposed rainwater harvesting targets and to develop a stormwater management and monitoring plan, in consultation with Council, to ensure that the existing stormwater infrastructure on-site is sufficient in accommodating any additional volume generated as a result of the project.

Issue	Consideration	Recommended Conditions
	<p>associated with the conversion of PET into preforms and closures.</p> <ul style="list-style-type: none"> • However, there would be emissions of Volatile Organic Compounds (VOCs) associated with the printing of labels on some of the products. • To manage VOC's, DECCW recommended that an extraction and afterburner system be installed to capture and treat these emissions. • The assessment concluded that with these management systems in place and given that the nearest sensitive location is approximately 500m south of the project site, any potential air impacts would be managed. • The Department is satisfied that any air impacts are within acceptable limits and could be adequately managed. 	<p>pollution (including odour) in accordance with the <i>Protection of the Environment Operations Act 1997</i>; and</p> <ul style="list-style-type: none"> • install and implement an extraction and afterburner system, as described in the EA, to capture and treat the Volatile Organic Compounds (VOCs) emitted from the printing process, prior to the commencement of operations.
Noise	<ul style="list-style-type: none"> • Heggies prepared a detailed noise assessment of the potential construction and operational impacts from the proposal. • The nearest private residence from the facility is located 500m to the south of the subject site. • The noise assessment has concluded that construction and operational noise emissions from the site would comply with relevant DECCW criteria at the nearest property. • The noise assessment has also confirmed that any potential cumulative noise impacts associated with the operation of the proposal with the existing CCA operations on the site would also comply with the relevant noise criteria. • Potential road traffic noise and sleep disturbance impacts were also considered in the noise assessment. The assessment has also confirmed that the proposal would also comply with both the road traffic noise and sleep disturbance criteria. 	<ul style="list-style-type: none"> • The Department has recommended conditions requiring the Proponent to: <ul style="list-style-type: none"> • Comply with day, evening, night and sleep disturbance criteria; and • Comply with construction and operational hours.
Contributions	<ul style="list-style-type: none"> • The proposal is located within the 'M7 Business Hub'. Goodman and the Austral Brick Company Pty Ltd are the current owners of the site. Since 2005, Goodman has gained approval for and developed a number of significant logistics facilities within the M7 Hub including the Coca Cola Warehouse Distribution Centre, Coles National Distribution Centre (NDC) and Coles Chilled Distribution Centre. • In order for these developments to proceed and to ensure there were 'satisfactory arrangements' in place for the provision of both local and regional infrastructure, Goodman and Austral Bricks entered into a Developer Agreement with the then Minister for Planning for the whole of the M7 Business Hub as part of the determination of the Coca Cola Warehouse Distribution Centre and Coles NDC projects in June 2005. The area to which this developer agreement applies includes the site the subject of this application. • Under the agreement Goodman is required to: <ul style="list-style-type: none"> ○ undertake infrastructure works, including water, sewer, stormwater drainage, telephone, electricity, gas and cable services; ○ contribute towards the provision for regional transport infrastructure; ○ upgrade sections of Wallgrove Road and 	<ul style="list-style-type: none"> • N/A

Issue	Consideration	Recommended Conditions
	<p>Old Wallgrove Road; and</p> <ul style="list-style-type: none"> ○ contribute towards the upgrade of Old Wallgrove Road/M7 Motorway Interchange. • Further, Goodman is required to provide for the re-use of Southbridge House and the conservation of Reedy Creek Riparian Zone. The agreement also requires Goodman to pay any s94 contributions to the satisfaction of Council, when the s94 Plan is made. • In August 2009 the Government announced its intention to impose a \$180,000 per developable hectare Special Infrastructure Contribution (SIC) levy for developments in the WSEA. The SIC is required to assist in the provision of regional road infrastructure including the 'Erskine Park Link Road Network'. Other developments in the area are already committed to contributing this rate toward the provision of regional road infrastructure in the WSEA. • Notwithstanding, the Department considers the existing developer agreement between Goodman and the Minister of June 2005, requiring Goodman to contribute to both local and regional infrastructure, adequate in providing for regional transport infrastructure and services in place of a State Infrastructure Contribution. • The Department is satisfied that adequate commitments and payments for infrastructure has been agreed by Goodman. 	
<i>Risk Management</i>	<ul style="list-style-type: none"> • Small amounts of cleaning agents, solvents, greases will be used in the manufacturing process. • These materials would be stored in dangerous goods storage cabinets and the total volume would not exceed 200L. • A sealed mechanically ventilated Ink Storage Room will be built for the storage of UV Inks used in the printing of closures. • The Ink Storage Room would be designed in accordance with AS1940-2004 <i>The storage and handling of flammable and combustible liquids</i>. • The bulk PET and HDPE resins as well as the finished Preforms and Closures are not considered as dangerous goods. • A Hazard Analysis found that the project would not cause any risk. • The Department considers that the proposed development meets all relevant safety requirements stipulated by the Department and would not be considered an offensive or hazardous development. 	<ul style="list-style-type: none"> • The Department has recommended conditions requiring the Proponent to: <ul style="list-style-type: none"> • prepare and implement a Fire Safety Study to the satisfaction of the Director-General and the NSW Fire Brigades; • ensure all chemicals are appropriately stored and banded in accordance with Australian Standards; and • ensure all staff are aware of the storage and handling requirements of any chemicals on-site.
<i>Waste Management</i>	<ul style="list-style-type: none"> • The manufacturing process converts PET and HDPE resin pellets into preforms and closures generating a small volume of waste plastic material at the start up process (approximately 0.1% of raw material). • All PET waste material is either recycled internally within the regrind preform manufacturing process or recycled externally by Plastic Recyclers for reuse. • Other wastes expected includes: <ul style="list-style-type: none"> • General solid waste (non-putrescibles) (i.e. reject performs / closures, plastic dust and purge blocks) • Hazardous waste (DG Class 3 flammable) 	<ul style="list-style-type: none"> • The Department has recommended conditions requiring the Proponent to manage all waste generated by the project.

Issue	Consideration	Recommended Conditions
	<p>(i.e. empty ink/colourant drums and waste oil drums); and</p> <ul style="list-style-type: none"> • Liquid waste (i.e. waste water) • To manage these wastes, the Proponent proposes to implement a comprehensive waste management plan. • The Plan would record waste volumes, methods for how any waste is recycled, re-used or removed and conduct waste audits to monitor the effectiveness and efficiency of waste segregation procedures and recycling/re-use initiatives. • The Department is satisfied that the waste management measures proposed by Goodman would ensure waste generated by the proposal is appropriately managed. 	
Visual	<ul style="list-style-type: none"> • The site of the proposed manufacturing facility is located within an existing industrial estate and forms part of the Goodman's M7 Industrial Estate and the WSEA. • The proposal would be located near a number of existing facilities operated by CCA. • This includes a warehouse facility which is 46,000m² with a height of 13.8m, an approved high bay warehouse around 28.2m in height and an approved cold store which is 11.4m high. • The proposed facility is around 10,800m² in area and 17.4m at its highest point. • Given the nature of the surrounding development, the existing distribution centre and the topography of the local area, it is considered that the proposed development will not have a significant impact on the local area. • The Department concludes that the measures proposed by CCA to integrate the proposed manufacturing facility with the existing distribution centre through the use of similar design and colour elements will help to ensure that any visual impacts of the project would be acceptable. 	<ul style="list-style-type: none"> • The Department has recommended conditions requiring the Proponent to: <ul style="list-style-type: none"> • Obtain the Director-General's approval for any signage and fencing on the site; and • Ensure any lighting is undertaken in accordance with Australian Standards.
Greenhouse Gas Emissions	<ul style="list-style-type: none"> • The proposal has the potential to generate greenhouse gas emissions, primarily associated with the consumption of electricity at the subject site • The assessment determined that the proposal could result in approximately 32,638 tonnes of CO₂-e/annum or 0.02% of NSW emissions. • To address this Goodman indicates that a number of efficiency measures would be undertaken to reduce the proposals energy use by between 5-10% for example. 	<ul style="list-style-type: none"> • The Department has recommended conditions requiring the Proponent to: <ul style="list-style-type: none"> • Ensure the project is energy and water efficient, in accordance with industry best practice, to the satisfaction of the Director-General; and • Implement all energy and water efficiency measures outlined in the EA and, over time, regularly review opportunities to implement further efficiency measures.

6. RECOMMENDED CONDITIONS

The Department has prepared recommended conditions of approval for the project (see Appendix A) These conditions are required to:

- prevent, minimise, and/or offset adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance; and
- provide for the ongoing environmental management of the project.

Conditions of approval have been prepared in consultation with Blacktown City Council. Goodman accepts the imposition of these conditions.

7. CONCLUSION

The Department has assessed the merits of the project in accordance with the requirements in the EP&A Act.

This assessment has found that the environmental impacts of the project can be mitigated and or managed to ensure an acceptable level of performance.

It has also found that the manufacturing of plastics on site would promote ESD and is consistent with the objectives of the State Plan, Metropolitan Plan, and local strategic planning for the area.

The proposed development as been designed appropriately to ensure that it would not have unacceptable environmental impacts.

Finally, the proposal offers significant economic and social benefits to the North Western Sydney region, as it would attract up to \$48 million worth of capital investment and would employ 16 additional staff.

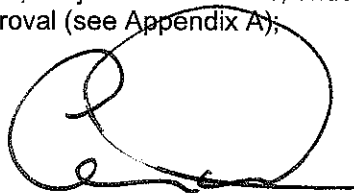
Consequently, the Department believes that the project is in the public interest and should be approved subject to conditions.

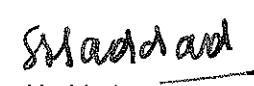
8. RECOMMENDATION

It is RECOMMENDED that the Director-General:

- consider the findings and recommendations of this report;
- approve the project application, subject to conditions, under section 75J of the EP&A Act; and
- sign the attached project approval (see Appendix A);


Chris Ritchie
Manager – Industry 4/4/11

 4.4.11
Chris Wilson
Executive Director


Sam Haddad
Director-General 18/4/2011