

The URBIS logo consists of the word "URBIS" in a bold, sans-serif font, positioned to the left of a square frame. A thick black line runs horizontally across the page, passing through the middle of the square frame. A vertical line runs down the page, passing through the top of the square frame.

**URBIS**

# **SSD-21190804 - JALCO MANUFACTURING FACILITY**

Environmental Impact Statement

Prepared for  
**JALCO AUSTRALIA PTY LTD**  
8 November 2021

**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

Director	Jacqueline Parker
Consultant	John Booth
Consultant	Andrew Lee
Project Code	P0033962
Report Number	Final

---

**Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.**

**We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.**

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Pty Ltd  
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

**[urbis.com.au](http://urbis.com.au)**

# CONTENTS

<b>Signed Declaration .....</b>	<b>1</b>
<b>Glossary and Abbreviations .....</b>	<b>3</b>
<b>Executive Summary.....</b>	<b>5</b>
<b>1. Introduction .....</b>	<b>11</b>
1.1. Applicant Details .....	11
1.2. Project Description .....	12
1.3. Project Background & Consideration of Alternatives .....	13
1.4. Development Consent History .....	14
1.5. 277-289 Woodpark Road, Smithfield .....	21
<b>2. Strategic Context.....</b>	<b>24</b>
2.1. Alignment with Strategic Planning Directions .....	24
2.2. Key Features of Site and Surrounds.....	27
2.3. Cumulative Impacts with Future Projects .....	30
2.4. Agreements with Other Parties .....	31
<b>3. Project Description .....</b>	<b>32</b>
3.1. Project Overview.....	32
3.2. Detailed Description .....	33
<b>4. Statutory Context .....</b>	<b>43</b>
4.1. Statutory Controls .....	43
4.2. Pre-Conditions to Approval .....	44
4.3. Mandatory Matters for Consideration .....	44
<b>5. Community and Stakeholder Engagement.....</b>	<b>49</b>
5.1. Engagement Carried out.....	49
5.2. Community Views .....	49
<b>6. Environmental Impact Assessment .....</b>	<b>51</b>
6.1. Detailed Assessment Impacts .....	51
6.2. Standard Assessment Impacts .....	82
6.3. Cumulative Impact Assessment .....	87
<b>7. Evaluation of Project.....</b>	<b>89</b>
7.1. Project Design.....	89
7.2. Strategic Context .....	96
7.3. Statutory Context .....	96
7.4. Summary and Conclusion.....	99
<b>Disclaimer.....</b>	<b>101</b>
<b>Appendix A</b>	<b>SEARS Compliance Table</b>
<b>Appendix B</b>	<b>Architectural Drawings</b>
<b>Appendix C</b>	<b>Statutory Compliance Table</b>
<b>Appendix D</b>	<b>Community Engagement Outcomes Report</b>
<b>Appendix E</b>	<b>Mitigation Measures &amp; Environmental Risk Assessment</b>
<b>Appendix F</b>	<b>Air Quality Impact Assessment</b>
<b>Appendix G</b>	<b>BCA Assessment Report</b>
<b>Appendix H</b>	<b>BCA Assessment Memo</b>
<b>Appendix I</b>	<b>Cost Estimate Summary</b>
<b>Appendix J</b>	<b>Dangerous Goods Design Report</b>
<b>Appendix K</b>	<b>Fire Safety Strategy</b>
<b>Appendix L</b>	<b>Operational Noise Impact Assessment</b>

<b>Appendix M</b>	<b>Preliminary Hazard Analysis</b>
<b>Appendix N</b>	<b>Transport Statement</b>
<b>Appendix O</b>	<b>Waste Management Plan</b>
<b>Appendix P</b>	<b>Contaminated Water Retention</b>
<b>Appendix Q</b>	<b>Services Change of Use Letter</b>
<b>Appendix R</b>	<b>BDAR Waiver Approval SSD</b>
<b>Appendix S</b>	<b>Liquid Process Flow Diagram</b>
<b>Appendix T</b>	<b>Bushfire Protection Assessment</b>
<b>Appendix U</b>	<b>Environment Protection Licence 2746</b>

## FIGURES

Figure 1 Plan of Subdivision from approved DA-893.1/2013 (as amended).....	16
Figure 2 SSD-10436 Mod-1 Warehouse 1 Layout .....	19
Figure 3 Lot 201 Aerial – 17 October 2021 .....	21
Figure 4 Smithfield Facility Site Context.....	22
Figure 5 Region Plan’s Structure Plan .....	25
Figure 6 Site Location Map.....	27
Figure 7 Overall Lot 201 Warehouse Plan .....	35
Figure 8 Proposed Site Layout .....	37
Figure 9 Detail of Proposed Equipment.....	40
Figure 10 Operational Process Map.....	40
Figure 11 Proposed Tenancy Layout .....	41
Figure 12 Warehouse 1 Parking Occupancy vs Parking Supply.....	55
Figure 13 Noise Catchment Areas .....	58
Figure 14 Lot 201 Fire Service Infrastructure .....	63
Figure 15 Level of Assessment PHA.....	69
Figure 16 Quantities of DGs Stored & Handled .....	70
Figure 17 Site Layout – PHA Assessment .....	71
Figure 18 Locations of Sensitive Receptors .....	78
Figure 19 Measured and Estimated Odour Emission Parameters .....	79
Figure 20 Estimated Odour Emission Rates .....	80
Figure 21 Odour Impacts .....	81
Figure 22 Proposed Site Layout – Option 1 .....	91
Figure 23 Proposed Site Layout – Option 2 .....	92
Figure 24 Proposed Site Layout – Option 3 .....	93
Figure 25 Proposed Site Layout – Option 4 .....	94

## TABLES

Table 1 Applicant Details .....	11
Table 2 Project Alternatives.....	13
Table 3 Site DA History .....	14
Table 4 Summary of Key Site Features & Characteristics .....	27
Table 5 Project Details.....	32
Table 6 Lot 201 Development Summary as approved by SSD-10436 MOD 1 .....	33
Table 7 Identification of Statutory Requirements for the Project.....	43
Table 8 Pre-Conditions to Approval.....	44
Table 9 Mandatory Considerations.....	44
Table 10 Clause 23 WSEA SEPP Compliance .....	46
Table 11 Community Views .....	50
Table 12 SSD-10436 MOD 1 Approved Traffic Rates.....	52

Table 13 SSD-10436 MOD 1 Approved Parking Rates .....	52
Table 14 Lot 201 Traffic Generation – Combined Light & Heavy Vehicle.....	53
Table 15 Proposed Traffic Generation vs Approved .....	53
Table 16 Lot 201 GFA .....	54
Table 17 Parking Requirements vs Provision.....	54
Table 18 Warehouse 1 EoT Facilities Proposed vs Required.....	56
Table 19 Operational Noise Limits .....	57
Table 20 Predicted Operational Noise Levels – MOD3 Masterplan and Lot 201 Warehouse 1 (Unmitigated) .....	60
Table 21 – Predicted Operational Noise Levels – MOD3 Masterplan and Lot 201 Warehouse 1 (Mitigated).....	61
Table 22 Proposed Fire Safety Strategy .....	64
Table 23 Major Hazard Facility Thresholds .....	70
Table 24 Hazard Identification Table.....	72
Table 25 Bushfire Hazard Assessment .....	83
Table 26 Estimated Quantities of Operational Waste .....	84
Table 27 Recommended Storage Ware for Weekly Operations .....	85



# SIGNED DECLARATION

## Submission of Environmental Impact Statement

Environmental Assessment prepared by:

Names:	<b>Jacqueline Parker</b> BPLAN Hons1 (UNSW) MUDD (UNSW) <b>John Booth</b> BPLAN Hons (UNSW)
Address:	Urbis Pty Ltd Level 8, Angel Place 123 Pitt Street Sydney NSW 2000
In respect of:	SSD-21190804: Jalco Manufacturing Facility

### Applicant and Land Details:

Applicant:	Jalco Australia Pty Ltd C/ ESR Developments (Australia) Pty Ltd
Applicant address	Level 29, 20 Bond Street, Sydney NSW 2000
Land to be developed:	Warehouse 1, Lot 201, Horsley Logistics Park 8 Johnston Crescent, Horsley Park
Legal description:	Lot 201 DP 1244593
Project Summary	Fit-out and use of Warehouse 1 tenancy for General Industry and ancillary Warehouse & Distribution for the purposes of a liquid chemical manufacturing facility. Installation of high-tech manufacturing, bottle filling and storage equipment.

We certify, to the best of our knowledge, the content of the Environmental Impact Statement:

- Complies with the relevant EIS requirements in Schedule 2 of the EP&A Regulation.
- Has been prepared having regard to the 'Preparing an Environmental Impact Statement: State Significant Development Guide'.
- Contains all available information relevant to the assessment of the project.
- Contains no false or misleading information.
- Contains a consolidated description of the project in a single chapter of the EIS.
- Addresses the SEARs for the project.

- Identifies and addresses the relevant statutory requirements for the project, including the relevant matters for consideration in environmental planning instruments.
- Contains an accurate summary of the findings of any community engagement and the detailed technical assessment of the impacts of the project.
- Contains a comprehensive evaluation of the impacts of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.

Name/Position:	Jacqueline Parker Director	John Booth Consultant
Signature:		
Date:	08 November 2021	08 November 2021



# GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
CEEC	Critically Endangered Ecological Community
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CMP	Construction Management Plan
CTMP	Construction Traffic Environmental Plan
DCP	Development Control Plan
DPIE	NSW Department of Planning, Industry and Environment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
HIPAP	Hazardous Industry Planning Advisory Paper
LEP	Local Environmental Plan
MNES	Matters of National Environmental Significance
NRAR	Natural Resource Access Regulator
OEMP	Operational Environmental Management Plan
PBP	Planning for Bushfire Protection
PCT	Plant Community Type

Reference	Description
POM	Plan of Management
PSI	Preliminary Site Investigation
SAIL	Serious and Irreversible Impacts
SARs	Commonwealth Supplementary Assessment Requirements
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Site	Lot 201 in Deposited Plan 1244593
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2009</i>
SSD	State Significant Development
SSDA	State Significant Development Application
TIA	Traffic Impact Assessment
UXO	Unexploded Ordnance
VIS	Vegetation Integrity Score
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

# EXECUTIVE SUMMARY

The Environmental Impact Statement (EIS) has been prepared on behalf of Jalco Australia Pty Ltd in support of a State Significant Development Application (SSDA) for use of Warehouse 1 Lot 201 for the purposes of General Industry and associated warehouse and distribution, and associated fit-out at 8 Johnston Crescent, Horsley Park.

The SSDA seeks consent for

- Change of use to permit *General Industrial* use within Warehouse 1 Lot 201 at Horsley Logistics Park,
- Works associated with the fit-out and 24 hours / 7 days operation of a manufacturing facility for the production of liquid soap, detergent and home and personal care consumer liquid products.
- Installation of fit-out for the storage of goods prior to their distribution off premises and operation as ancillary *warehouse and distribution*.
- Fit-out of the 375sqm storage shed for purposes of DG liquid storage shed. Installation of liquid pumping machinery.

It is intended that the operation would enable the production and packaging of liquid soaps and detergents for household use by Jalco, including their storage prior to distribution to retail outlets across Sydney.

The proposed development has an estimated capital investment value of \$33,970,490 and is classified as a State significant development (SSD) under Schedule 1, Cause 10 of the *State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)*, as it is “Chemical, manufacturing and related industries” development that:

- (1) *Has a capital investment value of more than \$30 million for the purpose of the manufacturing of reprocessing of the following (not including labelling or packaging)—*
  - a. *Soap, detergent or cleaning agents*

This EIS has been prepared to support the SSDA and responds to the relevant matters listed within the Secretary’s Environmental Assessment Requirements (SEARs) issued in June 2021.

## Project Vision, Objectives and Outcomes

Jalco Australia is currently operating out of an existing facility in Smithfield, approximately 9km from the proposed site. The Smithfield site manufactures both liquid and powder domestic cleaning products. Given the need to expand operations to cater for increased market demand and associated increased need for production speed and capacity, Jalco is seeking to relocate their liquid manufacturing and distribution operations to a new state-of-the-art facility to support the requirements of the chemical manufacturing operations.

In doing so, Jalco seeks to utilise best available technology to not only meet the growing demand for Jalco products, but also implement best practice in regard to environmental harm minimisation with the scale of new technologies to be installed within Warehouse 1.

The intended outcomes from this project are to:

- Provide a new state of the art manufacturing and bottling facility to support Jalco’s expanding operations,
- Operate the facility in accordance with best practice environmental management, and
- Minimise vehicle kilometres travelled through proximity of manufacturing to the Sydney regional road network.

## Site History

The subject site has been the subject of numerous development consents following its previous operation as a brick quarry by CSR. Consents issued by the NSW Land & Environment Court and Fairfield City Council has seen transition of the site through quarry filling, remediation, earthworks and subdivision to a precinct intended for industrial and warehouse operations. Site benching and internal road construction have been completed to facilitate the site’s transition into Horsley Logistics Park (HLP).

Under SSD-10436, ESR Australia has obtained SSD Development Consent for construction of four warehouse and distribution buildings with associated hardstand, parking and landscaping across Lot 201, 202, 203 and 204 within HLP. Of note, the consent issued for SSD-10436 and its associated MOD 1 includes the construction of the Lot 201 warehouse, including the Jalco tenancy, associated hardstand and carparking, stormwater management. As a result, no physical built form works associated with the building, hardstand, car parking, truck parking or landscaping are proposed as part of SSD-21190804.

Jalco has chosen this site and tenancy following consideration of the following alternatives

- Remaining at Jalco's current Smithfield operation is not preferred due to the age of the facility and its technologies whose lease area on 50% of its site is set to expire. Jalco seeks an opportunity to relocate its liquid manufacturing facility to enable greater efficiencies in its production.
- Other tenancies throughout Sydney were contemplated through a site selection bid process, however Warehouse 1 Lot 201 at HLP was identified as the preferred option at it:
  - Is a new building purpose designed for Jalco's operations, within the Western Sydney Employment Area
  - Proximal to other similar industrial and warehouse operations
  - The site has low ecological, heritage and archaeological value
  - It benefits from excellent access to the motorway network, existing and planned utility services infrastructure and other employment generating uses with a similar scale and character.
- An alternative plan to consolidate the existing facility was considered. It was ultimately found not to be viable. In addition, consideration was given to abandoning the market and closing their domestic manufacturing capability. This was found not to be in the best interest of Jalco clients or the broader community.

## Strategic Context

The proposal has also been assessment in accordance with its consistency with the key planning objectives, priorities and actions outlined within relevant strategic land use and transport planning policies including:

- NSW State Priorities
- *Greater Sydney Region Plan: A Metropolis of Three Cities*
- Our Greater Sydney 2056: Western City District Plan
- Future Transport Strategy 2056
- Better Placed

## Project Description

The key features of the proposal are summarised below:

- Change of use of the approved Lot 201 Warehouse 1 to General Industry with associated Warehouse and Distribution Use, and 24 hours / 7 day operation as a liquid chemical manufacturing facility.
- Fit-out of the tenancy with high tech machinery and storage in the approximate following area breakdown:
  - Dispatch and Receiving office – 30m<sup>2</sup>
  - Bottle storage area – 5,400m<sup>2</sup>
  - Liquid packaging area – 5,000m<sup>2</sup>
  - Workshop – 285m<sup>2</sup>
  - Flammable liquid dispensary – 300m<sup>2</sup>
  - Product manufacture and packaging area – 1,400m<sup>2</sup>
  - Automated warehouse – 7,300m<sup>2</sup>

- Use of the machinery for:
  - the receipt of bulk liquids from delivery trucks, including Dangerous Goods, and their associated storage,
  - mixing of raw soap and detergent liquids in combination with water to make them suitable for domestic cleaning purposes,
  - packaging of those liquid soaps and detergents into plastic bottles via high speed and regular speed filling lines,
  - automated packing and stacking of sale-ready domestic cleaning products in the warehouse component of the tenancy,
  - dispatch of product from the warehouse to trucks for distribution to retail outlets for sale.
- Outside of the main warehouse, installation and operation of the following
  - LPG storage area – 375m<sup>2</sup>
  - Liquid storage shed – 375m<sup>2</sup>
  - Three liquid truck filling bays
  - Dissolved Air Flotation (**DAF**) facility for wastewater treatment on site

It is intended that the operation will produce the following quantities of chemical liquid:

- 1000T expected in May 2022,
- Additional, 1000T expected in September 2022 (2000T),
- Additional 1000T in June 2023 (3000T),
- Additional 1000T in December 2024 (4000T).

Overall, the construction/fit-out, commissioning and operation of the site is expected at the following timeframes:

- Construction & fit-out works – 12 weeks completion April 2022
- Equipment testing & commissioning
  - 8 weeks completion in May 2022 – Legacy lines transferred from Smithfield
  - 12 weeks completion in September 2022 – High Speed Filling Lines
- Operation – expected commencement date
  - May 2022 – Legacy Lines transferred from Smithfield
  - September 2022 – High Speed Filling Lines

## Statutory Context

This EIS considers the relevant regulatory framework applicable to the site and the proposal and contains an assessment of the proposal against the following statutory controls and regulatory instruments:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *State Environmental Planning Policy (Western Sydney Employment Area) 2009*
- *State Environmental Planning Policy 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *Biodiversity Conservation Act 2016*
- *WSEA – Fairfield DCP 2016*

Schedule 1 clause 8(2) of the *Protection of the Environment Operations Act 1997 (POEO Act)* notes that production of soap and detergent products is to be declared a scheduled activity if the facility has a capacity to produce more than 5,000 tonnes of soap and detergent a year.

Given the proposal would produce an approximate 180,000,000 litres of soap and detergent products a year, the proposal is triggered as a scheduled activity, and thereby an Environmental Protection License will be required for the operation of the proposal.

## Community and Stakeholder Engagement

Community and stakeholder engagement has been undertaken by ESR Australia in the preparation of the SSDA. This includes direct engagement and consultation with:

- Residential neighbours located on Greenway Place, Horsley Park and Jacfin Horsley Park.
- Government, agency and utility stakeholders listed within the SEARs.

It is noted that one (1) community member provided feedback to the ESR Engagement feedback line, regarding the height of the building for Lot 201 and 204, and its visual obtrusion into neighbouring residential properties. This building height matter was considered during the assessment of the Horsley Logistics Park SSD-10436. There was no concern raised in relation to Jalco's use and operations.

No comments were received from the relevant agencies/authorities that required a change to the original proposed operation or fit-out for the Jalco tenancy.

## Environmental Impact Assessment

This EIS assesses the proposed development in relation to relevant planning instruments and policies and considers the likely environmental impacts of the proposal, including:

- **Traffic and Transport** – the traffic generation anticipated by the proposed operation was assessed as being less than that approved in the SSD-10436 MOD 1 consent for the Warehouse 1 tenancy. Carparking numbers provided in the SSD-10436 consent are sufficient for the parking demand as assessed based on Jalco's current operation at Smithfield.
- **Noise & Vibration** – the noise and vibration assessment found that the expected operations will remain within the approved noise criteria established for the HLP under SSD-10436 MOD 1 consent.
- **Fire & Incident Management** – Overall, the proposal is considered to be generally compliant and safe with regard to fire and incident management. Warehouse 1, as approved under SSD-10436 MOD 1 was endorsed by the DPIE on the 4 August 2021, and similarly, the wider SSD-10436 approval which included concurrence from the Rural Fire Service (**RFS**) and Fire & Rescue NSW (**FRNSW**) supports the overall fire and emergency access for Warehouse 1.
- **Hazard and Risk** – Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.
- **Soil and Water** – The proposal does not involve ground works and relies on the stormwater management measures approved for the warehouse 201 building via SSD-10436 MOD 1. Operationally, water management on the site will be in accordance with the existing procedures established in existing Jalco sites, the appropriate water flow management hazardous material containment measures.
- **Air Quality** – An Air Quality Impact Assessment predicts that the level of odour resulting from the proposed operation will fall below the adopted odour impact criterion of 2 ou.
- **Bushfire** – no changes are proposed to the building that would change its acceptable bushfire risk profile from that assessed under SSD-10436 MOD 1.
- **Waste Management** – Operational waste management can be adequately accommodated on site within the building footprint.

Very few mitigation measures have been identified as being required to reduce the low level of anticipated impacts. Recommended mitigation measures for the assessed issues include:

- Traffic Impact Mitigation

Similarly, as required by SSD-10436:

- Traffic control would be required to manage and regulate traffic movements into and out of the site during construction.
- Disruption to road users would be kept to a minimum by scheduling intensive delivery activities outside of peak network hours.
- Construction and delivery vehicles would be restricted to using Old Wallgrove Road, Lenore Drive, M7 Motorway and Mamre Road.
- Noise & Vibration
  - 18mm marine plywood internal lining fixed to inside of purlins to the Southern elevation of Liquid Packaging Area. The plywood lining is required have a minimum surface density of 10 kg/m<sup>2</sup> and form a continuous layer to the full height of the 0.48m steel external wall.
  - Four-sided enclosure to rooftop fans, minimum enclosure height 1.0m above fan height.
  - Acoustic louvres to the Southern elevation of Liquid Packaging Area, specified as NAP 300 H-line, Fantech SBL1 or equivalent.
- Fire & Safety
  - Preparation of a fire safety strategy to address the specific hazards identified in the development
- Hazard & Risk
  - The warehouse and/ or site boundaries are capable of containing 702m<sup>3</sup> of water storage required to meet the needed 7.8m<sup>3</sup>/min of discharge for the warehouse fire, sprinkler activation and contaminated water release.
  - A storm water isolation point (i.e. penstock isolation valve) is to be incorporated into the design. The penstock shall automatically isolate the storm water system upon detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course.
- Air Quality
  - Ensure all equipment are maintained in good condition and serviced as per manufacturer's recommendations.
  - Inspect the site daily and apply good housekeeping in general. General measures will include ensuring the timely clean-up of any spills as well as identifying and rectifying any leaks that could contribute to fugitive emissions.
  - Any modifications to the proposed design should consider positioning emission sources as far as practicable from neighbouring receptors.
  - Manage vehicle emissions by minimising idling times and installing signage to instruct drivers to turn off engines while loading/unloading etc.
  - Complaints should be investigated as soon as possible so that effective appraisal of the complaint can be carried out by subjective **assessment**.
- Bushfire
  - No additional mitigation measures required beyond those adopted for SSD-10436.
- Waste Management
  - The detail contained in the Waste Management Plan will inform the location and specifications for a dedicated waste storage area within the Jalco tenancy, to be detailed for Construction Certificate stage. Additional waste management measures, including waste servicing, waste avoidance, re-use and recycling, communication strategies, signage, monitoring, and reporting are discussed in the WMP and should be implemented in the operational phase of the development.
- ESD

- Water management - in accordance with the existing procedures established in existing Jalco sites, the appropriate water flow management will be established for the relevant cleaning, waste-water treatment and rainwater flow. Additionally, the appropriate containment measures will be established for the hazardous water containment.
- Achievement of BCA Section J Energy Efficiency for the base building, as approved under SSD-10436.
- Requirement to ensure additional fit-out works for the proposed Jalco operation, including air conditioning, light & power, hot water supply achieve the requirements of BCA Section J.
- Greenhouse Gas and Energy Efficiency
  - It is recommended that the building be verified against a reference building using the Verification Method JV3. This will determine if the proposed development and its services has an equal or less annual energy consumption of the reference building. Compliance and how it is achieved should be documented in a report by an appropriately qualified engineer for certification.
- Environmental Management
  - The operation will require the issue of an Environmental Protection Licence to inform its daily operations.

Each of the recommended mitigation measures has been reviewed in detail and it is considered that they can be incorporated as conditions of consent and implemented during the demolition, construction and operational phases of the development.

## Evaluation of Project

The EIS demonstrates the proposal will not result in any significant departures from applicable controls or unreasonable environmental effects. The proposed development is considered appropriate and reasonable based on the following:

- The proposed use and operation is consistent with the intended use of land within the Western Sydney Employment Area and will be synergistic with other approved uses within the Horsley Logistics Park.
- The proposal for use and fit-out will not result in any change to the approved built form on the site.
- Operational impacts have been assessed to fall below those anticipated by the site's building consent SSD-10346 or below the required thresholds of relevant industry criteria.
- Mitigation measures have been identified to ensure the minimal impacts resulting will be reduced as much as possible to protect the amenity of surrounding sensitive land uses.
- The proposal will enable Jalco to relocate its existing chemical manufacturing facility from its current site at Smithfield which is no longer able to survive the level of production required for the liquid manufacturing operations, enabling it to continue to cater for market demand for household cleaning products.
- The proposal has been assessed as being consistent with the relevant statutory requirements including the EP&A Act, relevant SEPPs and the Biodiversity Conservation Act.
- No issues were raised in relation to the proposed use and operation during the pre-lodgement consultation with community and agencies.

In view of the above, it is submitted that the proposal is in the public interest and should be approved subject to appropriate consent conditions.



# 1. INTRODUCTION

This Environmental Impact Statement (**EIS**) has been prepared on behalf of Jalco Australia Pty Ltd (**Jalco**) in support of a State Significant Development application (**SSDA**) for a change of use from 'Warehouse & Distribution Centre' to 'General Industry' to enable future operations of a chemical manufacturing facility within Lot 201, Warehouse 1. The construction of the base building for Jalco was approved under SSD-10436 Modification 1 (**the Project**).

This EIS has been prepared in response to Secretary's Environmental Assessment Requirements (**SEARs**) issued on 30 June 2021.

This report includes assessment of compliance with the statutory and strategic planning framework, and all other potential environmental impacts identified through the preparation of this SSDA. Further, this report has been prepared with consideration of the *draft Environmental Impact Assessment Guidance Series* released in June 2017 and the *Preparing an Environmental Impact Statement* Exhibition Draft released in December 2020. This EIS also provides an assessment of the proposal against the relevant considerations under Section 4.15 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**).

This EIS is structured in the following manner:

- An introduction to the project, including project objectives, project background and analysis of feasible alternatives;
- Identification of the strategic context of the site, including:
  - Analysis of the site and its surrounding context;
  - Identification of key strategic policies;
  - Analysis of cumulative impacts;
  - Identification of planning agreements associated with the project.
- A detailed description of the project;
- Identification of statutory planning policies relevant to the assessment and evaluation of the project;
- A summary of community engagement activities;
- Consideration of key planning issues relating to the proposed development, including a response to issues identified in the SEARs; and
- A comprehensive evaluation of the project.

This EIS should be read in conjunction with all supporting documentation appended to this report at **Appendix A – Appendix U**.

## 1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Company	Jalco Australia Pty Ltd C/- ESR Developments (Australia) Pty Ltd
Postal Address	Level 29, 20 Bond Street, Sydney NSW 2000
ABN	45075091833
Nominated Contact	Grace Macdonald
Contact Details	02 9186 4759

## 1.2. PROJECT DESCRIPTION

This EIS is submitted to the Department of Planning, Industry and Environment (**DPIE**) on behalf of Jalco Australia Pty Ltd in support of an application for SSD application number SSD-21190804 at 8 Johnston Crescent, Horsley Park. The SSDA seeks consent for:

- Change of use to permit *General Industrial* use within Warehouse 1 of Lot 201 at Horsley Logistics Park,
- Works associated with the fit-out and 24 hours / 7 days operation of a manufacturing facility for the production of liquid soap, detergent and home and personal care consumer liquid products.
- Installation of fit-out for the storage of goods prior to their distribution off premises and operation as ancillary *warehouse and distribution*.
- Fit-out of the 375sqm storage shed for purposes of DG liquid storage shed. Installation of liquid pumping machinery.

Commercial and industrial development significantly contributes to the NSW economy. NSW is home to a leading range of industrial sectors, including the food and beverage, aerospace, medical technology, research, finance, retail, and creative industries. Many companies in these sectors use state-of-the-art technology and highly skilled staff to create and sell their products. Manufacturing, for example, contributes around \$33 billion to the NSW economy and employs more than 362,000 people through direct jobs and indirectly through related industries such as freight and professional services.

The term 'manufacturing' now covers a much broader range of activities than those performed in traditional factories. Today, manufacturing centres on complex research and design work in the preproduction phase. There are also many value-adding post-production opportunities in the form of ongoing services. The proposal by Jalco Australia is looking to capitalise on the current growth of this sector and the role it can play in the NSW economy's response to the COVID-19 Pandemic.

As noted within the DPIE's *Building Business Back Better*, the entire industrial sector, particularly those in manufacturing have had to be more agile in response to COVID-19, have had to quickly adapt to changing markets in order to remain competitive, as well as utilise new technologies and innovate to meet the challenges of a post pandemic world. Thereby, it is the intention of Jalco to directly address this need with a new state-of-the-art facility that will allow them to capitalise on the growth they are currently experiencing.

The DPIE's March 2021 Explanation of Intended Effect for *Building Business Back Better* noted that there is a changing need for industrial buildings within NSW. There remains a shortage of serviced industrial land and rising land values in locations that are part of established and future employment precincts. Thereby the NSW government is encouraging the use of innovative, mixed use industrial facilities. These developments combine light industrial, modern manufacturing and warehousing with increased ancillary office space. This is directly aligned with the proposed use of Warehouse 1 within the HLP, a modern warehouse facility that is able to be utilised for multiple development types, and not strictly limited to the traditional logistics development that is common within developments such as the HLP.

Noting this, the proposed change of use to *General Industry* and utilisation of the industrial land for manufacturing purposes is directly aligning with the objectives as set out in *Building Business Back Better* to further unlock employment land and ensure that businesses that can drive the NSW economy in the post pandemic setting are able to capitalise on available land and infrastructure.

Noting the above, the following objectives have been identified as forming the basis of the proposed development:

- Operational expansion and utilisation of serviced industrial land in line with the land use objectives of the *State Environmental Planning Policy (Western Sydney Employment Area) 2009 (WSEA SEPP)*;
- Support the growth of Jalco Australia via the relocation of their liquid manufacturing and distribution operations to a new state-of-the-art facility to support the requirements of the chemical manufacturing operations;
- Deliver economic benefits and employment generation for Western Sydney and the Greater Sydney Region;
- Incorporate specialist technical input to provide a holistic response to the careful siting and design of internal chemical storage and manufacturing fit-out within the approved building; and

- Respond to the site context and key interfaces with surrounding lands, including sensitive receivers to ensure an appropriate and sustainable development outcome, through adopting recommended measures to avoid, minimise or manage potential impacts.

### 1.3. PROJECT BACKGROUND & CONSIDERATION OF ALTERNATIVES

Jalco identified several project alternatives which were considered in respect to the identified need for the proposed chemical manufacturing facility. Each of these options is listed and discussed in the following table.

Table 2 Project Alternatives

Option	Assessment
Do Nothing	<p>A 'do-nothing' approach was ultimately considered. It was identified as non-viable as it would be contrary to the overall objectives of the proposal.</p> <p>Jalco Australia is operating out of an existing facility in Smithfield, approximately 9-km from the proposed site. The Smithfield site manufactures both liquid and powders. Given the need to expand operations, Jalco has decided to relocate their liquid manufacturing and distribution operations to a new state-of-the-art facility to support the requirements of the chemical manufacturing operations. In doing so they are able to utilise best available technology to not only meet the growing demand for Jalco products, but also implement best practice in regard to environmental harm minimisation with the scale of new technologies to be installed within Warehouse 1.</p> <p>Similarly, Jalco's current lease at their Smithfield facility is set to expire on a significant proportion (approximately 50%) of the existing liquid manufacturing footprint. An alternative plan to consolidate the existing facility was considered and found not to be viable. There was consideration of abandoning the market and closing their domestic manufacturing capability. This option was found not to be in the best interest of Jalco clients or the broader community.</p>
Alternative Design	<p>The proposed location within HLP was subject to a site selection process, having regard to available industrial tenancy spaces that meet the specific requirements for the chemical manufacturing component with associated warehouse and distribution facilities.</p> <p>Jalco undertook a competitive tender process which considered multiple developers and sites across Western Sydney. Key factors for considering their next site included the timing of the development, price, and site configuration. Based on final tenders submitted by a variety of developers, Jalco decided to enter into a Heads of Agreement with ESR on 24 December 2020 for Lot 201, Warehouse 1.</p> <p>The final siting and design of the proposed manufacturing plant within HLP was resolved through a comprehensive analysis of the site opportunities and constraints. A range of options were explored for the site access and tenancy layout. The proposed warehouse tenancy layout is able to optimise the site area appropriately, whilst providing the benefit of being located within a broader warehouse and logistics facility. The proposed access from Johnston Crescent and Old Walgrove Road is considered an optimal location and was supported by Fairfield City Council and the DPIE with the approval of SSD-10436.</p>

Option	Assessment
Proposed Design	<p>The proposal is justified on the basis that it is compatible with the locality in which it is proposed, resulting in economic benefits and achievement of the overall project objectives, while managing and mitigating any potential environmental impacts.</p> <p>The overall site for the Jalco facility was strategically selected within an industrial estate in accordance with the WSEA SEPP. It has low ecological, heritage and archaeological value. It also benefits from excellent access to the motorway network, existing and planned utility services infrastructure and other employment generating uses with a similar scale and character. All potential environmental impacts concerning the proposal are able to be suitably mitigated, in particular noise and air quality impacts. Accordingly, the current site and proposed design was considered the most viable for the proposed manufacturing facility development.</p> <p>The warehouse and bottle storage areas are chosen to be at the north of the building towards the driveway to minimise truck delivery/residence time on site and to avoid traffic congestions, as well as to utilise the recessed docks for warehousing and container loading purpose. The relocation of dock frontage to different faces of the warehouse building were identified as inappropriate under SSD-10436 given the rural residential receivers south of the site. Therefore, the flexibility of manoeuvring the warehouse and bottle storage components of the site is minimised as they require direct frontage toward docks and the hardstand.</p> <p>Multiple layouts have been considered and the current layout has been chosen as it supports the operations model, production process flow and significantly minimises the forklift moments within the facility – thus improving site safety.</p> <p>While other arrangements and designs for the proposed development are possible, the proposed arrangement is deemed optimal for the location based upon functionality, long term financial viability, off-site amenity impacts and the necessary tenancy size and amenity.</p>

## 1.4. DEVELOPMENT CONSENT HISTORY

The approval of warehouse 1 of Lot 201 at Horsley Logistics Park (8 Johnston Crescent, Horsley Park) has been established following a number of site preparation and construction development approvals across the HLP and the subject site.

### 1.4.1. Site Preparation / Subdivision History

The site, as part of the former CSR Estate Lands, was previously used for brickmaking and quarrying. The former operation of the quarry has resulted in the clearance of all vegetation, removal any original soils and the overall wholesale disturbance of the landscape. Subsequently, the CSR estate and subject site was established for alternate development through the previous subdivision and site preparation works as detailed below.

Table 3 Site DA History

DA Number	Date of Approval	Consenting Authority	Description of Development
893.1/2013	19/12/2013	NSW Land & Environment Court	Torrens Title subdivision to create 14 lots and 1 residue lot in 3 stages.
893.2/2013	Withdrawn	Fairfield City Council	Reconfiguration of approved lots.
893.3/2013	Withdrawn	Fairfield City Council	Torrens title subdivision.
893.4/2013	18/06/2018	Fairfield City Council	Minor amendments to features of the subdivision in each of the 3 stages.
893.5/2013	Under Assessment	Fairfield City Council	Modification application proposing to further stage approved stage 2.
893.6/2013	13/11/2019	Fairfield City Council	Modification application proposing to further stage approved stage 2.
893.7/2013	Under Assessment	Fairfield City Council	Modification application proposing to split stage 2 into two separate stages (submitted on 5 August 2019).
65.1/2016	04/02/2016	Fairfield City Council	Construction of a landscape bund water supply pond to facilitate an existing Brick Factory in Lot 2 DP 1228114 in Stage 3.
86.1/2016	15/02/2016	Fairfield City Council	Subdivision to create two (2) Torrens Title lots.
292.1/2016	04/08/2016	Delegated Authority	Construction of roadworks, stormwater drainage, associated construction works and sediment control along an 160m portion of Old Wallgrove Road.
437.1/2016	27/10/2016	Delegated Authority	Earthworks – biofiltration trench and drainage swale. Including an approval of a Remediation Action Plan (RAP) in accordance with SEPP 55.

The following provides further detail of the previous approvals that are of relevance to the subject site (Warehouse 1 of Lot 201).

### **DA 893.1/2013 Approved Works – CSR Estate Subdivision, Earthworks & Infrastructure**

DA893.1/2013 was lodged with Fairfield City Council on 19 December 2013 and determined by the LEC on 16 October 2015. The approval enabled the CSR Estate to be subdivided and constructed in three stages. These stages established the relevant lot subdivision and site preparation works across the site. The approvals for Stages 1 and 2 via DA 893/2013 include subdivision of Lots 201, 202, 204 & 206, bulk earthworks and infrastructure servicing construction including estate roadways, trunk drainage and individual drainage connections, water supply, sewer, power and telecommunications.

The map displays a land development plan with several key features:

- Parcels and Areas:**
  - Parcel 101 (top left)
  - Parcel 102 (middle left)
  - Parcel 201 (bottom left, 13.35 ha)
  - Parcel 202 (middle left, 5.04 ha)
  - Parcel 203 (middle right, 4.02 ha)
  - Parcel 204 (bottom right, 4.00 ha)
  - Parcel 205 (middle right, 11.51 ha)
  - Parcel 206 (top right, 21.87 ha, labeled 'RESIDUE')
- Roads and Infrastructure:**
  - BURLEY ROAD:** Runs horizontally across the top.
  - RESERVED ROAD:** A narrow road running vertically between parcels 101/102 and 201/202.
  - PROPOSED ROAD:** A red dashed line forming a large rectangular boundary around parcels 201, 202, 203, and 204.
  - EXISTING STAGE 1:** A dashed line indicating a previous stage of development.
  - TEMPORARY TURNING HEAD:** A blue dashed line showing a proposed turning area for traffic.
  - R.O.C. 6.0m WIDE:** Right-of-way width specification for the temporary turning head.
- Other Labels:**
  - 101, 102:** Large numbers identifying the main sections of the plan.
  - (5.88 ha):** Area specification for a section within parcel 202.
  - 201.2:** A small area or distance label near parcel 202.
  - 202.2:** A small area or distance label near parcel 202.
  - 203.2:** A small area or distance label near parcel 203.
  - 204.8:** A small area or distance label near parcel 204.
  - 205.8:** A small area or distance label near parcel 205.
  - 206.8:** A small area or distance label near parcel 206.
  - 207.8:** A small area or distance label near parcel 207.
  - 208.8:** A small area or distance label near parcel 208.
  - 209.8:** A small area or distance label near parcel 209.
  - 210.8:** A small area or distance label near parcel 210.
  - 211.8:** A small area or distance label near parcel 211.
  - 212.8:** A small area or distance label near parcel 212.
  - 213.8:** A small area or distance label near parcel 213.
  - 214.8:** A small area or distance label near parcel 214.
  - 215.8:** A small area or distance label near parcel 215.
  - 216.8:** A small area or distance label near parcel 216.
  - 217.8:** A small area or distance label near parcel 217.
  - 218.8:** A small area or distance label near parcel 218.
  - 219.8:** A small area or distance label near parcel 219.
  - 220.8:** A small area or distance label near parcel 220.
  - 221.8:** A small area or distance label near parcel 221.
  - 222.8:** A small area or distance label near parcel 222.
  - 223.8:** A small area or distance label near parcel 223.
  - 224.8:** A small area or distance label near parcel 224.
  - 225.8:** A small area or distance label near parcel 225.
  - 226.8:** A small area or distance label near parcel 226.
  - 227.8:** A small area or distance label near parcel 227.
  - 228.8:** A small area or distance label near parcel 228.
  - 229.8:** A small area or distance label near parcel 229.
  - 230.8:** A small area or distance label near parcel 230.
  - 231.8:** A small area or distance label near parcel 231.
  - 232.8:** A small area or distance label near parcel 232.
  - 233.8:** A small area or distance label near parcel 233.
  - 234.8:** A small area or distance label near parcel 234.
  - 235.8:** A small area or distance label near parcel 235.
  - 236.8:** A small area or distance label near parcel 236.
  - 237.8:** A small area or distance label near parcel 237.
  - 238.8:** A small area or distance label near parcel 238.
  - 239.8:** A small area or distance label near parcel 239.
  - 240.8:** A small area or distance label near parcel 240.
  - 241.8:** A small area or distance label near parcel 241.
  - 242.8:** A small area or distance label near parcel 242.
  - 243.8:** A small area or distance label near parcel 243.
  - 244.8:** A small area or distance label near parcel 244.
  - 245.8:** A small area or distance label near parcel 245.
  - 246.8:** A small area or distance label near parcel 246.
  - 247.8:** A small area or distance label near parcel 247.
  - 248.8:** A small area or distance label near parcel 248.
  - 249.8:** A small area or distance label near parcel 249.
  - 250.8:** A small area or distance label near parcel 250.
  - 251.8:** A small area or distance label near parcel 251.
  - 252.8:** A small area or distance label near parcel 252.
  - 253.8:** A small area or distance label near parcel 253.
  - 254.8:** A small area or distance label near parcel 254.
  - 255.8:** A small area or distance label near parcel 255.
  - 256.8:** A small area or distance label near parcel 256.
  - 257.8:** A small area or distance label near parcel 257.
  - 258.8:** A small area or distance label near parcel 258.
  - 259.8:** A small area or distance label near parcel 259.
  - 260.8:** A small area or distance label near parcel 260.
  - 261.8:** A small area or distance label near parcel 261.
  - 262.8:** A small area or distance label near parcel 262.
  - 263.8:** A small area or distance label near parcel 263.
  - 264.8:** A small area or distance label near parcel 264.
  - 265.8:** A small area or distance label near parcel 265.
  - 266.8:** A small area or distance label near parcel 266.
  - 267.8:** A small area or distance label near parcel 267.
  - 268.8:** A small area or distance label near parcel 268.
  - 269.8:** A small area or distance label near parcel 269.
  - 270.8:** A small area or distance label near parcel 270.
  - 271.8:** A small area or distance label near parcel 271.
  - 272.8:** A small area or distance label near parcel 272.
  - 273.8:** A small area or distance label near parcel 273.
  - 274.8:** A small area or distance label near parcel 274.
  - 275.8:** A small area or distance label near parcel 275.
  - 276.8:** A small area or distance label near parcel 276.
  - 277.8:** A small area or distance label near parcel 277.
  - 278.8:** A small area or distance label near parcel 278.
  - 279.8:** A small area or distance label near parcel 279.
  - 280.8:** A small area or distance label near parcel 280.
  - 281.8:** A small area or distance label near parcel 281.
  - 282.8:** A small area or distance label near parcel 282.
  - 283.8:** A small area or distance label near parcel 283.
  - 284.8:** A small area or distance label near parcel 284.
  - 285.8:** A small area or distance label near parcel 285.
  - 286.8:** A small area or distance label near parcel 286.
  - 287.8:** A small area or distance label near parcel 287.
  - 288.8:** A small area or distance label near parcel 288.
  - 289.8:** A small area or distance label near parcel 289.
  - 290.8:** A small area or distance label near parcel 290.
  - 291.8:** A small area or distance label near parcel 291.
  - 292.8:** A small area or distance label near parcel 292.
  - 293.8:** A small area or distance label near parcel 293.
  - 294.8:** A small area or distance label near parcel 294.
  - 295.8:** A small area or distance label near parcel 295.
  - 296.8:** A small area or distance label near parcel 296.
  - 297.8:** A small area or distance label near parcel 297.
  - 298.8:** A small area or distance label near parcel 298.
  - 299.8:** A small area or distance label near parcel 299.
  - 300.8:** A small area or distance label near parcel 300.
  - 301.8:** A small area or distance label near parcel 301.
  - 302.8:** A small area or distance label near parcel 302.
  - 303.8:** A small area or distance label near parcel 303.
  - 304.8:** A small area or distance label near parcel 304.
  - 305.8:** A small area or distance label near parcel 305.
  - 306.8:** A small area or distance label near parcel 306.
  - 307.8:** A small area or distance label near parcel 307.
  - 308.8:** A small area or distance label near parcel 308.
  - 309.8:** A small area or distance label near parcel 309.
  - 310.8:** A small area or distance label near parcel 310.
  - 311.8:** A small area or distance label near parcel 311.
  - 312.8:** A small area or distance label near parcel 312.
  - 313.8:** A small area or distance label near parcel 313.
  - 314.8:** A small area or distance label near parcel 314.
  - 315.8:** A small area or distance label near parcel 315.
  - 316.8:** A small area or distance label near parcel 316.
  - 317.8:** A small area or distance label near parcel 317.
  - 318.8:** A small area or distance label near parcel 318.
  - 319.8:** A small area or distance label near parcel 319.
  - 320.8:** A small area or distance label near parcel 320.
  - 321.8:** A small area or distance label near parcel 321.
  - 322.8:** A small area or distance label near parcel 322.
  - 323.8:** A small area or distance label near parcel 323.
  - 324.8:** A small area or distance label near parcel 324.
  - 325.8:** A small area or distance label near parcel 325

## DA 437.1/2016 – Earthworks and Remediation Action Plan

## DA 21.1/2020 – Earthworks and Remediation

DA 21.1/2020 relates to the approved Lot 306 DA 893.1/2013 (as amended) which sits outside the boundary of, and to the north of the HLP boundary. The DA sought to remediate land in Stage 2 and 3 of the CSR Estate by placing contaminated material from the former quarrying site in a containment cell excavation located on approved Lot 306 of DA 893.1/2013. Accordingly, all contamination within the HLP boundary is transferred into the containment cell at Lot 306. In accordance with the accompanying RAP, the ongoing management of that containment cell will be undertaken as the responsibility of CSR.

## 1.4.2. HLP and 201 Warehouse Approval

Following the appropriate lot subdivision and site preparation works as identified above, the relevant HLP development and Lot 201 Warehouse structure was approved in accordance with SSD-10436 and subsequent modifications:

DA Number	Date of Approval	Consenting Authority	Description of Development
SSD-10436	31/03/2021	Minister for Planning and Public Spaces	Horsley Logistics Park - Construction, fit-out and operation of eight warehousing and supporting infrastructure, parking and signage, including warehouse 201.
SSD-10436 Mod 1	04/08/2021	Minister for Planning and Public Spaces	Modification to the approved layout and design of Warehouse 201 including the dividing of the single warehouse into three separate tenancies, and associated changes to parking and amenity.  Change to GFA allocation on (then) Lot 202 and 204.
SSD-10436 Mod 2	Under assessment	Minister for Planning and Public Spaces	Amendments to Lot 204; renumbering of lots of ESR Horsley Logistics Park; amendments to development consent condition relating to development contributions.
SSD-10436 Mod 3	Under Assessment	Minister for Planning and Public Spaces	Further modification to the approved layout and design of Warehouse 201 including: <ul style="list-style-type: none"> <li>▪ Installation of six warehouse temperature control units onto roof of Warehouse 201</li> <li>▪ Removal of roller shutter doors from the western elevation of Warehouse 201</li> <li>▪ Amalgamation of Warehouse tenancies 2B &amp; 3, and fit-out works for cold storage for use by the future tenant</li> </ul>
SSD-10436 Mod 4	Preparing modification package	Minister for Planning and Public Spaces	Design modifications to the approved layout and design of Lot 204, including: <ul style="list-style-type: none"> <li>▪ Minor reconfiguration of warehouse footprint and building form</li> <li>▪ Division of the single warehouse space into two separate tenancies</li> <li>▪ Creation of an additional lot access/exit point to provided dedicated access to proposed Warehouse B, as well as reconfiguration of car parking to facilitate two tenancies</li> <li>▪ Installation of two additional recess docks for proposed Warehouse B</li> <li>▪ Changes to landscaping</li> </ul>

DA Number	Date of Approval	Consenting Authority	Description of Development
			<ul style="list-style-type: none"> <li>The building pads for Lot 204 are proposed to be lowered by approximately 2m.</li> </ul>

### SSD-10436 – Horsley Logistics Park

SSD-10436 development consent granted for the HLP on the 31 March 2021 under delegation of the Minister for Planning and Public Spaces. The approval received consent for the construction, fit-out and operation of eight warehousing and distribution tenancies in four buildings with a total gross floor area of 112,819m<sup>2</sup>, inclusive of offices, loading docks, hardstand areas, truck and car parking spaces, landscaping, infrastructure, and signage.

A single warehouse building was approved under SSD-10436 at Lot 201 with a GFA of 42,233m<sup>2</sup> and 1,095m<sup>2</sup> of office space. The warehouse building was provided with direct access to Johnston Crescent and a 3m high by 80m long masonry acoustic wall located 14 m from the southern boundary of Lot 201.

The approved development at Lot 201 also included the following detailed works:

- Detailed earthworks and landscaping works,
- On-lot stormwater and utility infrastructure and services connection,
- 232 at-grade parking spaces including three accessible spaces, and
- Ancillary infrastructure including sprinkler tank, rainwater tanks, and pump room.

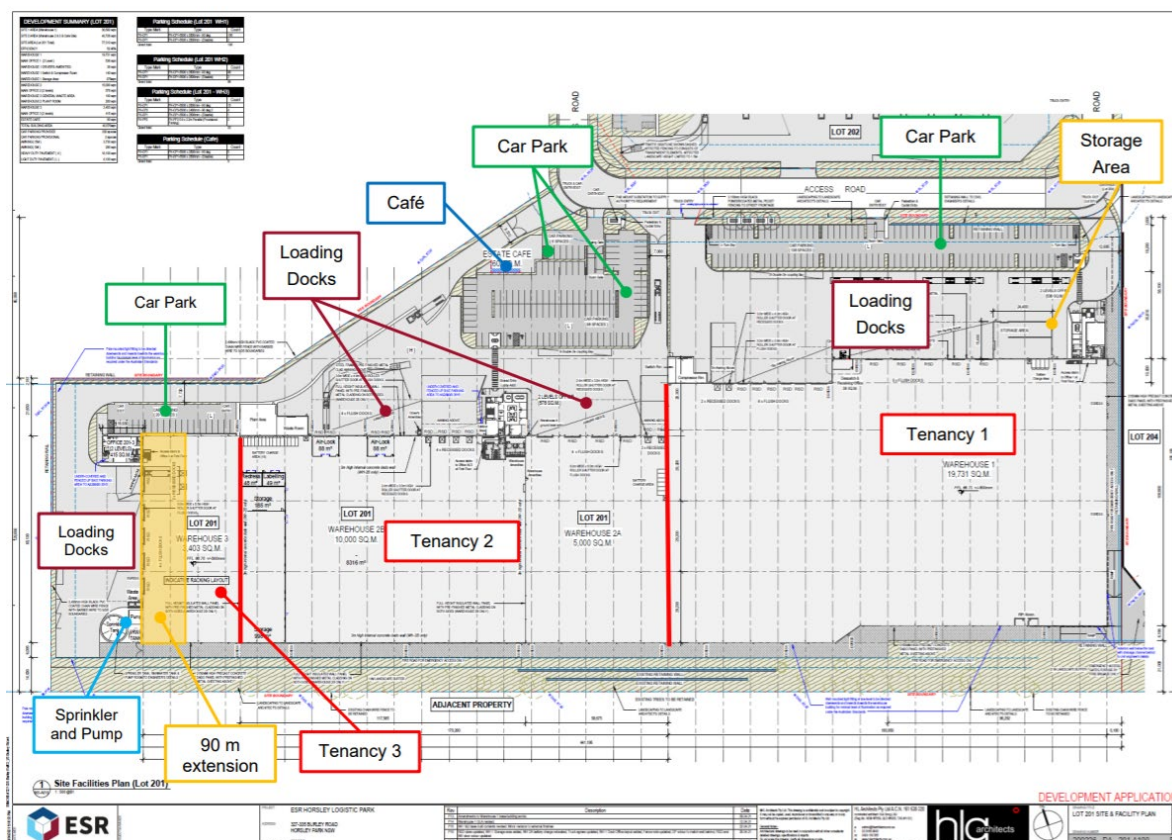
### SSD-10436 Mod 1

Modification 1 was approved on 4 August 2021 under Section 4.55(1A) of the EP&A Act to amend the layout of Lots 201 and 204, including separating the Lot 201 warehouse building into three separate tenancies and extending the building west and reducing the overall GFA of the development. The modification to Lot 201 included:

- Separation of the Lot 201 warehouse into three tenancies 1, 2A/2B and 3.
- Inclusion of one storage area north of tenancy 1.
- Extension of the Lot 201 warehouse 90m to the west.
- Reduction in total GFA of Lot 201 warehouse from 43,328m<sup>2</sup> to 39,663m<sup>2</sup>.
- Inclusion of a 60 m<sup>2</sup> café in Lot 201.
- Relocation and reconfiguration of car parks to the north of the Lot 201 warehouse building.
- Inclusion of additional 10 recessed loading docks and 23 flush docks.
- Inclusion of a new loading area to the west of Lot 201 warehouse building.
- Relocation of the approved pump room and sprinkler tanks.
- Redistribution of parking to the separated tenancies as follows:
  - 20 spaces north of proposed Warehouse tenancy 3,
  - 98 spaces with direct access from Johnson Crescent supporting proposed Warehouse tenancy 2, and
  - 108 car parking spaces north of proposed Warehouse tenancy 1 also with direct access from Johnson Crescent.



Figure 2 SSD-10436 Mod-1 Warehouse 1 Layout



## SSD-10436 Mod 2

Modification 2 seeks to reconfigure the approved warehouse at Lot 204 (to be re-identified as Lot 202). Additionally, this modification aims to conduct the following to the wider HLP site:

- Inclusion of an updated signage plan for the precinct and to be reflected in Condition B6 – Signage & Fencing.
- An amendment to Condition A22 – Contributions to Council. As the HLP is to be delivered in a staged manner, payment of Section 7.12 Contributions is sought to be reflective of this and carried out in stages prior to the issuing of a CC for each stage.
- Renumbering of the lots to reflect the approved plan of subdivision. Of note, Lot 201 to remain as Lot 201.

Mod-2 is currently under assessment by DPIE.

## SSD-10436 Mod 3

Modification 3 seeks to adjust the approved layout and design Warehouse 201 under SSD-10436-Mod-1. This modification is being prepared in tandem with this change of use and fit-out development application and has currently seen the relevant SEARs issued for its preparation.

The proposed modification to Warehouse 201 includes:

- Instillation of 11 warehouse temperature control units onto roof of Warehouse 201, associated with tenancies 2B & 3.
- Removal of roller shutter doors from the western elevation of Warehouse 201.
- Amalgamation of Warehouse tenancies 2B & 3, and fit-out works for cold storage for use by the future tenant.

As Mod 3 has been lodged to DPIE for assessment, the modification does not propose any structural changes to the base build. As such, the Mod 1 reconfiguration applies to this application. It is to be noted that the fit-out of Warehouse 1 for Jalco does not rely on the approval of MOD 3.

#### **SSD-10436 Mod 4**

Modification 4 seeks to modify the approved plans within Appendix 1 of the development consent to support design modifications to the approved layout and design of Lot 204 which includes:

- Minor reconfiguration of warehouse footprint and building form,
- Division of the single warehouse space into two separate tenancies,
- Creation of an additional lot access/exit point to provide dedicated access to proposed Warehouse B, as well as reconfiguration of car parking to facilitate two tenancies,
- Installation of two additional recess docks for proposed Warehouse B,
- Changes to landscaping,
- The building pads for Lot 204 are proposed to be lowered by 2 m. It is noted that these changes in pad levels will alter the overall height of the approved buildings, and as a result this will require further assessment of the resultant potential environmental impact.

A scoping meeting was held with the DPIE on the 15 September 2021 to discuss the application. The modification application is currently being drafted and will be lodged with the DPIE imminently.

#### **Facilitating the Jalco Facility**

The proposed Jalco facility is fully dependent on the delivery of Lot 201 as approved under SSD-10436 and as modified under MOD 1. The following approved construction works are being undertaken to facilitate the delivery of Warehouse 1 which will house the Jalco facility:

- Detailed earthworks and landscaping works,
- On-lot stormwater and utility infrastructure and services connection,
- 226 at-grade parking spaces including three accessible spaces, and
- Ancillary infrastructure including sprinkler tank, rainwater tanks, and pump room.

The construction works at the site are currently well advanced with detailed earthworks complete and the skeleton of the warehouse-built form commencing. It should be noted that all access works are now complete with the internal road being complete. The below photo from Nearmap in **Figure 3** was taken on the 17 October 2021 and highlights how advanced works on the site is. The fit-out of Warehouse 1 Lot 201 for Jalco will occur following completion of works approved under SSD-10436 (as modified). Fit-out works are expected to be completed April 2022.

Subject to the assessment of current SSD-10436 MOD 2, ESR anticipates the following indicative construction timeline for the entire Lot 201 warehouse:

- Construction Certificate – 28 June 2021
- Breaking Ground – 7 July 2021
- Erection of Building Framework – 2 September 2021
- Completion – February 2022\*

\*Completion date is continually under review due to COVID-19 restrictions and weather conditions at the site.

Figure 3 Lot 201 Aerial – 17 October 2021



Source: Nearmap, 2021

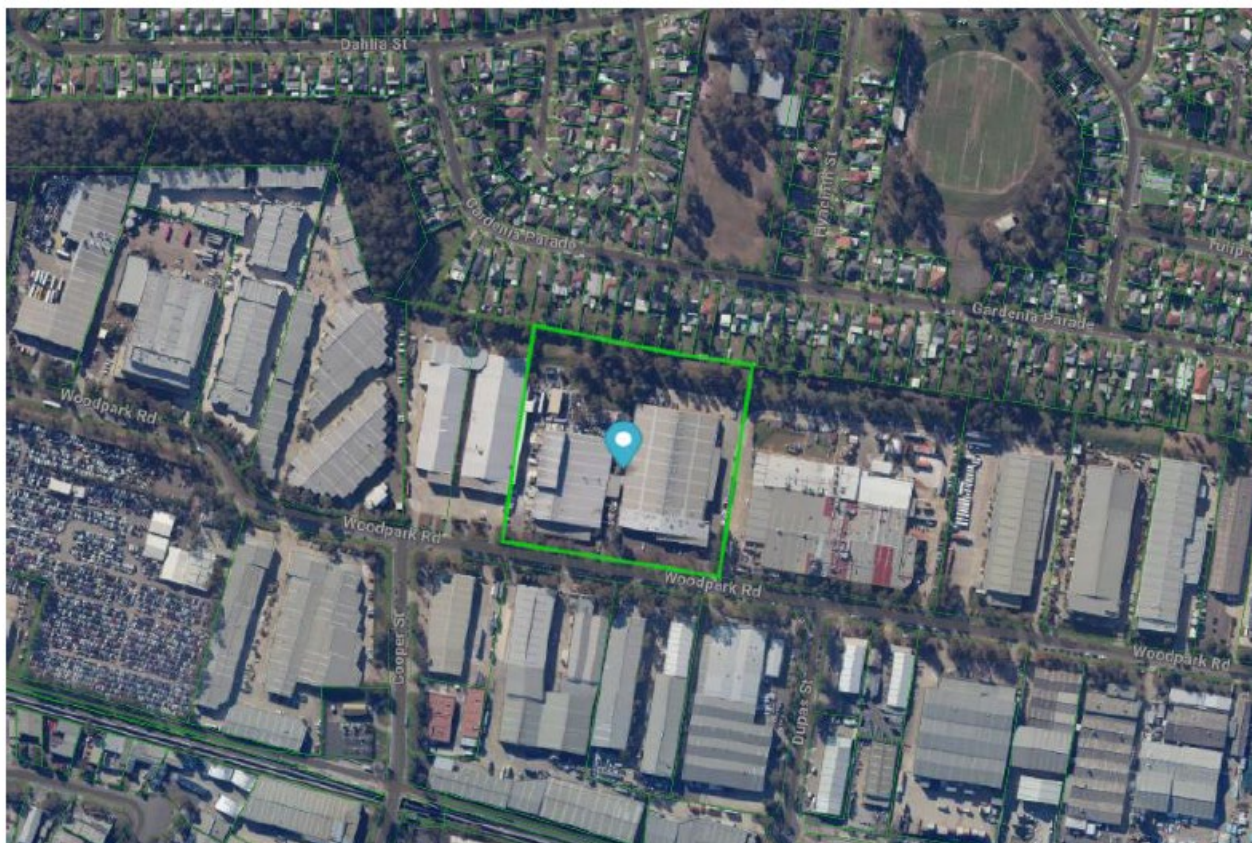
## 1.5. 277-289 WOODPARK ROAD, SMITHFIELD

Jalco's existing operation is located at 277-289 Woodpark Road, Smithfield where they have operated since August 1999. The facility is located within the established Smithfield Industrial Estate in the Cumberland LGA. The subject lot is uniform in shape with frontage to Woodpark Road in the south (see **Figure 4** below).

The site adjoins warehouse developments to the east and west, and low-density residential uses to the north. The rear of the site contains a 'site-specific buffer' zone to ensure an appropriate degree of separation between the industrial and residential land uses at the rear.



Figure 4 Smithfield Facility Site Context



Source: Jalco, 2021

A summary of past DA's relevant to the Smithfield site is provided below:

- DA-2000-43 - On 12 August 1999 Cumberland Council approved a DA for minor alterations and use of an existing industrial premises for the warehousing of household laundry, cleansing and personal care products.
- DA-2000-263 - On 4 February 2000 Council issued a further approval for the site for the rationalisation & consolidation of associated activities relating to the manufacture and warehousing of household detergents and cleaning products on adjoining sites. In addition, alterations and additions on the respective sites to facilitate the rationalization, including extension in manufacturing activities to include liquid products was also approved.
- DA-2018-321-1 - On 5 November 2019, the Local Planning Panel provided approval for the extension of hours of operation of existing manufacturing & warehouse use to carry out manufacturing 24 hours a day Monday to Friday and 7am to 3pm Saturday, Truck & external forklift movements from 7am to 7pm Monday to Friday and construction of an acoustic wall were also approved.
- MOD2020/0147 - On 10 March 2021, Council determined a modification application to extend the operating hours to allow for additional manufacturing operation, truck and forklift movements, and alter the site layout to improve site functionality and vehicular movements, including the reduction of on-site parking.
- DA2021/0327 – Is currently under assessment by Cumberland Council, with consent being sought for the re-development of the western industrial warehouse into a laboratory and office premises. The proposed DA has been prepared with consideration for proposed works under DA2021/0327 and will not conflict with these works.

The Smithfield facility is currently subject to an EPL (Licence number 2746) for the scheduled activity 'Chemical Production'. The licence relates to the production of soap and detergents on site in excess of 5,000 tonnes per annum. An ancillary activity for Chemical Storage Facilities is also identified within the EPL.

The EPL includes conditions which set limits and requirements in relation to any spills, leaks or escapes of chemicals which may cause pollution of land or water, noise limits to residential dwellings in proximity to the site and require ongoing monitoring and recording of air emissions and odour.

A high-level summary of the liquid manufacturing process as Smithfield that is to be adopted at the proposed HLP site is provided below:

### **Manufacturing Sequence**

1. Raw materials are delivered through bulk tankers and packages (drums, bags and IBC's). Bulk tanker deliveries are transferred to the bulk storage tank. Drums, IBC's and Bags are unloaded from the truck by using forklifts and are stored in package stores (Liquid Store, Dispensary, etc.)
2. Required raw materials are added to the mixing tanks via. material dosing/transfer systems (pipes, flow controls, level transmitters, pumps, etc).
3. The raw materials are mixed to meet the specification of that particular product and then transferred to storage tanks. this process is called bulk FG manufacturing.
4. The bulk FG that is manufactured and stored in the storage tank is then transferred to the associated filling line.
5. The liquid is then filled into the bottle and the bottles are then packed as per customer specification to transport.

### **Packaging Sequence**

1. Packaging materials such as bottles, labels, caps, triggers and inner/outer cardboards are delivered via. single trucks.
2. These packaging materials (except bottles) are stored in the warehouse. Bottles are stored in a dedicated bottle storage area.
3. The packaging materials are transferred to the packaging lines in necessary quantities as per the SKU that is scheduled to pack.
  - a) Labelled are transferred to the labeller that label an empty bottle.
  - b) Once the bottle is labelled, a coder will print the necessary details on the bottle (manufacturing date, expiry date, Julian code, etc)
  - c) The bottle is then filled to a set volume under the filler head.
  - d) The filled bottle is then transferred to a capping machine, where the cap is placed and tightened to a specific torque to prevent spillage while storing and transporting.
  - e) On a manual packing line, the capped bottle will be transferred to a rotating table, where the required number of bottles are placed in a box (example , 6 bottles per carton).
    - i. These cartons are the placed on a pallet manually as per the customer required pallet pattern.
  - f) On an automated packaging line, the capped bottles are stacked together to form a box pattern and transferred into a carton.
    - i. The series of cartons are then picked up by a palletising arm and placed onto a pallet as per customer required pallet pattern.
  - g) The pallets are then stretched/shrink wrapped and an SSCC label is applied to the finished pallet.
4. The products on a finished pallet (called FG 'Finished goods') are stored in the warehouse, ready for dispatch.

Attached to this EIS at **Appendix U** is the existing Smithfield EPL for consideration.

## 2. STRATEGIC CONTEXT

This section of the EIS describes the way in which the proposal addresses the strategic planning policies relevant to the site. It identifies the key strategic issues relevant to the assessment and evaluation of the project.

### 2.1. ALIGNMENT WITH STRATEGIC PLANNING DIRECTIONS

The proposed development is aligned with the State, district and local strategic plans and policies applying to the site as outlined below.

#### 2.1.1. NSW State Priorities

The NSW Premier has identified 12 priority areas essential for the growth and development of NSW. These include the creation of jobs and delivery of infrastructure. The proposal will contribute to the delivery of some of the state priorities, including:

- **Encouraging business investment:** the proposed chemical manufacturing facility will address a critical shortage of serviced land within Western Sydney and provide for increased investment in employment generating land use activities.
- **Accelerating major project assessment:** the proposal has been lodged as a SSDA in accordance with relevant legislation. The EIS include a comprehensive assessment of the proposed works to enable thorough review by the DPIE, Fairfield City Council and other stakeholders, including the community.
- **Improving road travel reliability:** the site is well located with access to the West-link M7 and M4 Western Motorways to leverage government investment in road infrastructure.

The proposal is consistent and strategically aligned with both the Premier and State priorities. The proposal will deliver economic development and employment generation in an accessible and suitable location.

#### 2.1.2. Greater Sydney Region Plan: A Metropolis of Three Cities

*A Metropolis of Three Cities: Greater Sydney Region Plan (Region Plan)* was finalised in March 2018. The Region Plan has been prepared in accordance with Section 3.3 of the EP&A Act. The Region Plan is built on a vision of three cities, where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. It identifies four themes: infrastructure and collaboration, liveability, productivity, and sustainability. Within these four themes, a set of planning priorities and actions are identified to achieve the Region Plan's vision.

The Region Plan includes a high-level structure plan identifying key centres, employment areas, and important infrastructure contributions. The site is identified as employment lands within the Western Sydney Employment Area (refer to **Figure 5** below).

The proposed development supports the vision for the Region Plan as summarised below:

- **Infrastructure and collaboration:** The Site is well-located. It has access to existing metropolitan road infrastructure such as the nearby M7, Wallgrove Road, and Mamre Road, and is considered suitable for its intended use. The proposal will utilise a currently vacant warehouse to generate income and is providing additional manufacturing jobs in line with the vision for the wider WSEA area.
- **Productivity:** the proposed development will deliver additional serviced industrial land and employment opportunities within the WSEA. The site is well-located in proximity to the M7 Motorway and given that it is located within an established industrial area that is capable of operating 24/7 days a week.

The Project is consistent with the strategic directions and objectives identified in the Greater Sydney Region Plan and will contribute to the provision of additional industrial space. The proposal will provide additional employment and economic growth to support the region.



Figure 5 Region Plan's Structure Plan



Source: Greater Sydney Commission

### 2.1.3. Our Greater Sydney: Western City District Plan

The Western District Plan is a 20-year plan to manage growth in the context of economic, social, and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

The planning priorities and actions likely to have implications for the proposed development are listed and discussed below:

- **Infrastructure and Collaboration:** The proposed development will assist in the delivery of essential infrastructure needed to support the Western Parkland City.

- **Liveability:** The proposed development will deliver employment opportunities accessible to nearby residents, thus contributing to the 30-minute city vision.
- **Productivity:** The site is within the WSEA and surrounded by land identified for future employment. The proposed development will supply industrial lands within a land release area in response to long-term projected population and development growth.
- **Sustainability:** The proposal includes a range of measures to mitigate, minimise or manage the potential environmental impact of the proposal. This EIS details stormwater management measures to protect and manage the existing natural systems and ecologically sustainable development initiatives to minimise demand on infrastructure systems, such as sewer, water, and electricity.

## 2.1.4. Future Transport Strategy 2056

The Future Transport Strategy sets the 40-year vision and strategy for managing the growth of transport services and infrastructure in NSW over the next 40 years. It has been developed alongside the Region Plan in order to provide an integrated planning framework for NSW, that supports the repositioning of Sydney as a metropolis of three cities.

For Greater Sydney, the plan is also built on the same vision of the 30-minute city, which it says will be underpinned by an integrated network of city-shaping, city-serving and centre serving corridors. To support this vision, transport for NSW has established 6 outcomes for Greater Sydney which demonstrate its aspirations for transport over the next 40 years. These outcomes will be used to guide transport services and infrastructure in Greater Sydney to 2056. The identified and relevant Greater Sydney outcomes include:

- Successful places;
- A strong economy;
- Safety and performance;
- Accessible services; and
- Sustainability.

Transport networks in the Western Parkland City will be developed in order to support sustainability and jobs growth in the District. The plan identifies that strategic transport corridors, which include city-shaping, city-serving and centre-serving networks will integrate the city to create 30-minute connections to strategic centres and metropolitan centres and clusters. The Western Sydney International (Nancy Bird Walton) Airport, as an economic catalyst, is also identified as a key node in this network that will be served by north-south rail links and east-west connections.

The proposed development will assist in the delivery of transport infrastructure within the wider WSEA as per the Voluntary Planning Agreement (**VPA**) (SVPA reference no. SVPA-2016-8153) entered into by CSR and the NSW DPIE on the 24 April 2017. This VPA provides for a monetary contribution of \$182,898 per hectare of net developable area (subject to indexation in accordance with the Minister for Planning and CSR Building Products Limited) for the former CSR site.

## 2.1.5. Better Placed

In August 2017, the Government Architect for NSW (**GANSW**) released *Better Placed*, the integrated design policy for NSW. Better Placed seeks to establish priorities and objectives that shape design to create well-designed built environments.

It presents a collection of priorities and objectives that aspire to shape design that addresses key challenges and directions and creates good design outcomes for NSW. The proposed development is consistent with the objectives given it will:

- Be readily absorbed into the industrial context and character of the surrounding area, noting that it will be located within an approved building (Objective 1);
- Incorporate sustainability measures to improve the environmental performance of the building (Objective 2);
- Be capable of complying with relevant accessibility provisions to ensure equitable access (Objective 3);
- Be fit for purpose in response to engineering and logistical requirements (Objective 5); and



- Contribute significant economic output and value add to the economy each year (Objective 6).

By adopting the objectives of the Better Placed policy, the proposed development responds to the key challenges and directions for NSW.

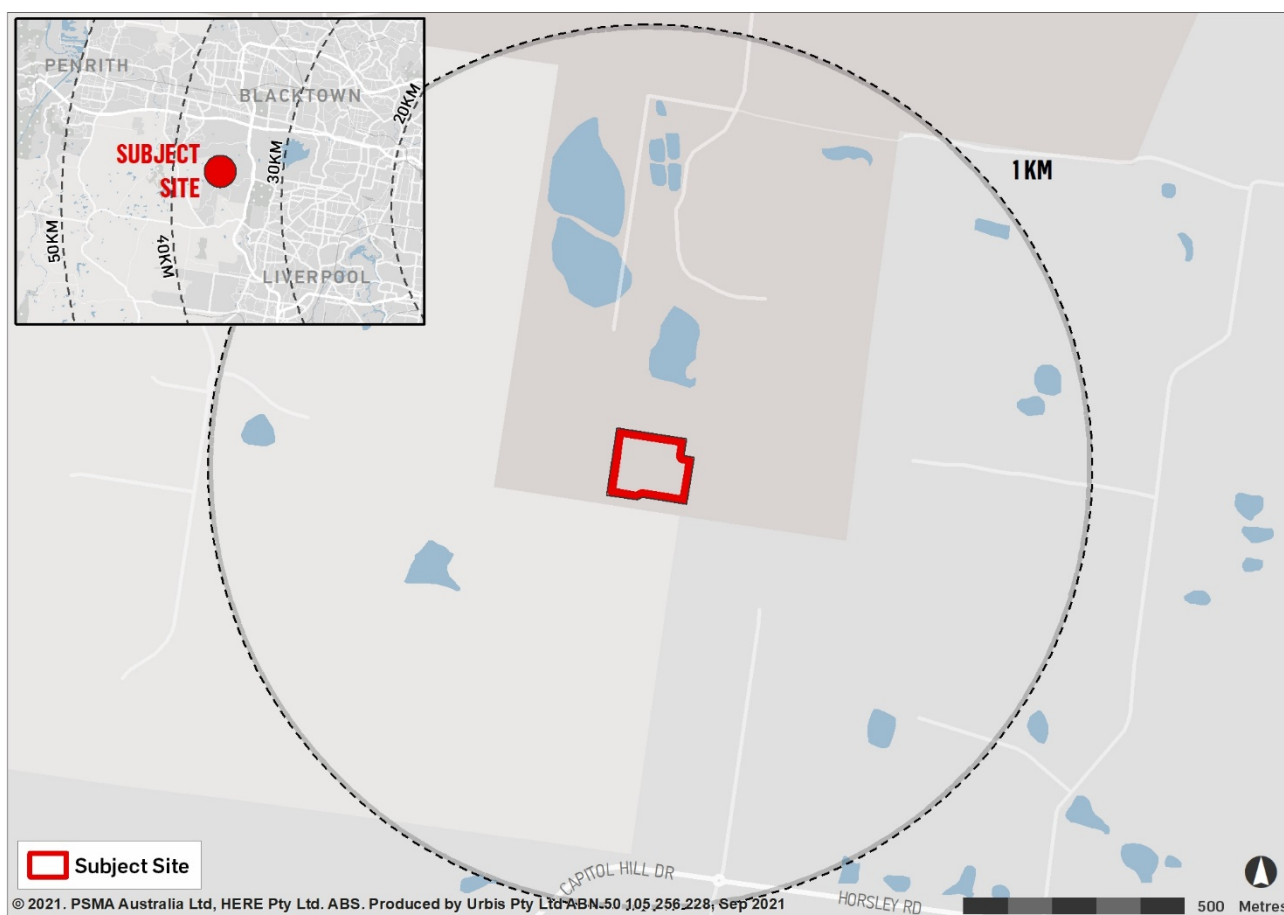
## 2.2. KEY FEATURES OF SITE AND SURROUNDS

### 2.2.1. The Site

#### 2.2.1.1. Site Description

The Site is Warehouse 1, Lot 201 in the HLP. It has a street address of 8 Johnston Crescent, Horsley Park. The legal description is Lot 201 in Deposited Plan 1244593. A site survey showing the geographic features and contours of the site is provided in **Appendix B**. A Site Location Map is provided below.

Figure 6 Site Location Map



Source: Urbis, 2021

Lot 201 is an irregular shaped allotment with a total area of 7.73-hectares (**ha**). Warehouse 1 specifically has a total site area of 36,582m<sup>2</sup> (as approved under SSD-10436 MOD 1). The Site is accessed via Johnston Crescent, an access road off Reserve Road and Burley Road which is currently being constructed as part of local DA893.1/2013 and will eventually be extended into an internal loop road within the HLP.

The following **Table 4** Summary of Key Site Features & Characteristics provides an overview of the key site features and characteristics.

Table 4 Summary of Key Site Features & Characteristics

Issue	Key Features & Characteristics
Topography	Bulk earthworks were complete at the site as per the works carried out in accordance with the historical consents approved by NSW Land & Environment

Issue	Key Features & Characteristics
	Court and by Fairfield City Council. The earthworks have been completed, resulting in the provision of large flat building pads with nominal grading and levels between RL 90.5-m AHD to RL 83.5-m AHD. The entire HLP generally grades from the south-east to the north/north-west.
Vegetation	Vegetation at Lot 201 is to be consistent with the Landscape Concept Plan prepared by Geoscapes approved under SSD-10436 and as modified under SSD-10436 MOD 1. No change to landscaping or vegetation is proposed as part of this subject SSD-21190804.
Existing Road Network	<p>The HLP is subject to the site-specific WSEA – Fairfield Development Control Plan (<b>DCP</b>) for land located at 32-335 Burley Road. The DCP anticipates the overarching subdivision of the site across 3 stages to develop the land. As previously stated, the site is located within Stage 2 of the subdivision. The subdivision will be accessed via two internal roads referred to as Access Road 1 (Johnston Crescent) and Access Road 2. Johnston Crescent is partially constructed at present and is anticipated to provide the primary access point until the longer-term road network is delivered (under separate approvals).</p> <p>In order to support the State Government's vision for the WSEA, a considerable amount of regional road network upgrades is required to accommodate increased traffic volumes in the general vicinity. The upgrades required within proximity to the HLP are outlined within the RMS's Old Wallgrove Road Upgrade (2015) with a majority of the works delivered during 2017-2018. Near the site the following works have been delivered to support the needs of the WSEA:</p> <ul style="list-style-type: none"> <li>▪ The upgrading of Old Wallgrove Road to three-lanes in each direction between Southridge Street and the M7 Motorway; and</li> <li>▪ The upgrading of Old Wallgrove Road to two-lanes in each direction between Southbridge Street and Robert Street with a central median to allow for potential three lanes in the future.</li> </ul> <p>As per the RMS's direction, the Southern Link Road is still to be constructed. The Southern Link Road is planned to run along the northern boundary of the precinct and will connect to the future Burley Road, thereby providing the precinct and the Site with greater regional connectivity to the WSEA, specifically Mamre Road. It should be noted at this point in time the Southern Link Road upgrade is yet to be funded and there are no committed timeframes for the upgrade.</p>
Access & Parking	<p>Lot 201 is to be accessed via Johnston Crescent and Access Road 2. Johnston Crescent is partially constructed at present and is anticipated to provide the primary access point until the longer-term road network is delivered (under separate approvals).</p> <p>Parking for Warehouse 1 on Lot 201 has been approved as 108 parking spaces including two accessible spaces as approved by the DPIE under MOD 1 of SSD-10436 on the 04 August 2021.</p>
Public Transport	The Site has limited connectivity to public transport options. The HLP is not located within 800m of any existing train stations with the nearest being Rooty

Issue	Key Features & Characteristics
	<p>Hill Station, approximately 11km from the Site. In terms of buses the Site is serviced by two bus stops within 800m. This includes the 813 Bus Service which provides connectivity between:</p> <ul style="list-style-type: none"> <li>▪ Fairfield Train Station</li> <li>▪ South-West Sydney TAFE</li> <li>▪ Prairiewood T-Way</li> <li>▪ Horsley Park shops</li> <li>▪ Bonnyrigg T-Way</li> </ul> <p>Another two bus routes (738 &amp; 835) are more than 1km from the Site.</p>
Hydrology & Flooding	<p>A Flood Impact Assessment was undertaken as part of the Civil Engineering Report lodged as part of the DA package for SSD-10436. The assessment undertaken by Costin Roe Consulting Pty Ltd concluded that the Site has a very low risk of flooding from Ropes Creek or other regional flooding. Thereby neither the approved HLP nor the proposed Project which is the subject of this EIS will affect the known overland flow paths or flood affected areas.</p>
Ground Water	<p>The site has historically been utilised for extractive industry to enable the manufacturing of bricks, which resulted in extensive extraction, reportedly to be up to 35m deep. In October 2013, Douglas Partners undertook a preliminary geotechnical investigation of the site in relation to a subdivision DA. The report identified the following geotechnical constraints on the site:</p> <ul style="list-style-type: none"> <li>▪ The presence of deep brick pits;</li> <li>▪ The partial backfilling of the brick pits with large volumes of uncontrolled filling;</li> <li>▪ The presence of many large stockpiles of soil and ripped rock (mostly clay and shale) situated both within the brick pits and scattered across the surrounding site areas; and</li> <li>▪ The effects of the kilns on the soils below and surrounding the kilns within the existing brock manufacturing plant.</li> </ul> <p>Groundwater levels have thereby been extensively altered. This impact was furthered with the bulk earthworks at the site undertaken as a result of previous approvals by Fairfield City Council and completed by CSR.</p> <p>The works as approved under SSD-10436 involved only minor changes to the earthworks levels completed under DA-292.1/201 and the impact on the overall groundwater system as a result was assessed by the DPIE as being low.</p>
Bushfire	<p>Eco Logical Australia were commissioned to undertake a Bushfire Protection Assessment of the HLP as part of the DA for SSD-10436 in accordance with Section 4.14 of the EP&amp;A Act and “<i>planning for Bushfire Protection</i>” (RFS 2019) (PBP). Following the assessment, it was the recommendation that the development site for the HLP be issued a Bushfire Safety Authority. The assessment found Lot 201 as having a Bushfire Attack Level (BAL) of BAL-29.</p>

Issue	Key Features & Characteristics
	Thereby the subject site is able to satisfy the aim and objectives of PBP for non-habitable development.
Heritage	<p>The subject Site is not identified as containing nor as being in proximity to any items of non-indigenous heritage significance.</p> <p>With regard to indigenous heritage, the assessment undertaken of the subject Site as part of the assessment of SSD-10436 found that two previous Aboriginal objects registered within the HLP had since been destroyed. The high level of ground disturbance as a result of historical land use and quarry operations occurring during the last two decades had likely harmed any potential items of significance or artefacts.</p> <p>Due to the level of past soil disturbance and low to nil potential for Aboriginal objects to exist it was considered unlikely that SSD-10436 Project works would harm Aboriginal heritage.</p> <p>The proposed works subject to this SSD DA involve the fit-out and operation of a previously approved building and no ground works are proposed.</p>

## 2.2.2. Site Surrounds

### 2.2.2.1. Regional Context

The Site is located in the Fairfield local government area (**LGA**), where it is approximately 15-kilometres (**km**) from the Penrith Central Business District (**CBD**), 17-km from the Parramatta CBD, and 35-km from the Sydney CBD (Figure 6). The Site, as with the rest of the HLP, is well located in the context of Western Sydney and the M4 and M7 Motorways. The HLP forms part of the WSEA, as identified under the WSEA SEPP by the DPIE, due to the area's strategic importance within the Sydney Metropolitan Area. The area provides a central location for employment generating activities whilst providing strong links with the major transportation infrastructure to facilitate the movement of goods regionally, nationally, and internationally.

The development site is surrounded by a variety of industrial land use activities and significant transport and utilities infrastructure. Immediately surrounding development includes:

- **North:** The Oakdale Central Business Hub (SSD-6078).
- **East:** Lot 202 of the HLP, which is approved for warehouse and distribution uses.
- **South:** Undeveloped IN1 General Industrial, RU4 Primary Production, and rural residential subdivision fronting Greenway Place.
- **West:** The Horsley Park Warehousing Hub (MP10\_0129 & MP10\_0130).

## 2.3. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within the South of the Warragamba Pipeline Precinct of the WSEA, with approved and likely future developments including:

- The Jacfin Horsley Park Industrial Estate Lands (68.5-ha) to the south and west as approved under Concept Plan for an industrial estate and Stage 1 project approval (MP10\_0129) for a 27,330-m<sup>2</sup> warehouse in the north-eastern portion of the land;
- The future alignment of the SLR located at the northern extent of the CSR Estate;
- Oakdale South Industrial Estate (SSD-6917) located approximately 400m to the west;
- Oakdale Central Industrial Estate (SS-6078) located approximately 580m to the north;

- Austral Bricks located approximately 550m to the north-east; and
- Rural residential and small holdings uses located outside the WSEA approximately 160m to the east.

The potential cumulative impacts of the project are addressed in **Section 6.3.3** of the EIS in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

## **2.4. AGREEMENTS WITH OTHER PARTIES**

Clause 29 of the WSEA SEPP states that the consent authority must not consent to development on land to which this clause applies unless the Director-General has certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of regional transport infrastructure and services. This clause applies to the site.

As executed on the 24 April 2017, CSR have entered into a Voluntary Planning Agreement (VPA) (SVPA reference no. SVPA-2016-8153) to address the above clause within the WSEA SEPP. The amended planning agreement provides that CSR will carry out road works and will make monetary contributions of \$182,898 per hectare of net developable area (subject to indexation in accordance with the Minister for Planning and CSR Building Products Limited) in connection with the Proposed Development for the purposes of regional transport infrastructure and services provision within the meaning of clause 29 of the WSEA SEPP.

The above VPA is currently the sole responsibility of CSR and has been paid by CSR. ESR previously contracted the land and settlement was conditional on all subdivision and remediation works being complete by CSR. With the completion of these works, ESR took ownership of the lots on 25 January 2021.

As such the requirements of Clause 29 have been satisfied in relation to this development prior to its commencement.

## 3. PROJECT DESCRIPTION

The following sections of the EIS summarise the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

### 3.1. PROJECT OVERVIEW

The key components of the proposed development are summarised in the following table. A copy of the architectural concept drawings is attached as **Appendix B**. An extract of the tenancy fit-out plan is included at **Figure 8** below.

Table 5 Project Details

Descriptor	Project Details
Land Use	General Industry with associated Warehouse and Distribution
Project Area	Warehouse 1 Lot 201 tenancy area, including building footprint, hardstand and car parking – 36,582m <sup>2</sup> – as approved under SSD-10436 MOD 1
Site Preparation	<p>Site earthworks to support future industrial development, landscaping and the site bund were previously approved under DA893/2013.</p> <p>The built form of Lot 201 to house the Jalco tenancy have been approved under SSD-10436 MOD 1. Site preparation and construction of the warehouse will be undertaken in accordance with that consent.</p> <p>No site preparation works are proposed as part of this SSD-21190804.</p>
Construction Summary	<p>Fit-out of Warehouse 1 Lot 201 for Jalco will occur following completion of works approved under SSD-10436 (as modified). Fit-out works are expected to be completed April 2022.</p> <p>Subject to the assessment of current SSD-10436 MOD 2, ESR anticipates the following indicative construction timeline for the entire Lot 201 warehouse:</p> <ul style="list-style-type: none"> <li>Construction Certificate – 28 June 2021</li> <li>Breaking Ground – 7 July 2021</li> <li>Erection of Building Framework – 2 September 2021</li> <li>Completion – February 2022*</li> </ul> <p>*completion date is continually under review due to COVID-19 restrictions and weather conditions at the site.</p>
Access & Parking	<ul style="list-style-type: none"> <li>Site access is provided via Johnston Crescent</li> <li>108 parking spaces are provided for Warehouse 1 as per SSD-10436 MOD 1</li> <li>Installation of three liquid truck filling bays with associated pumping infrastructure</li> </ul>
Gross Floor Area	No new GFA proposed beyond that approved under SSD-10436 MOD 1 as follows:

Descriptor	Project Details
	<ul style="list-style-type: none"> <li>19,731-sqm of internal manufacturing and warehouse space</li> <li>536-sqm of office space</li> <li>38-sqm of driver's amenities</li> <li>140-sqm of switch and compressor room</li> <li>375-sqm of liquid storage area</li> </ul>
Building Height	Maximum building height is 15m – as approved under SSD-10436
Jobs	<ul style="list-style-type: none"> <li>Construction (fit-out phase) – 40 FTE</li> <li>Operation – 75 FTE (50 warehouse, 25 office area)</li> </ul>
Hours of Operation	24-hour, seven days a week
Capital Investment Value	\$33,970,490 (Refer to <b>Appendix I</b> )

## 3.2. DETAILED DESCRIPTION

### 3.2.1. Project Area

The proposed chemical manufacturing facility is to be located within Warehouse 1 of Lot 201 in the HLP. Lot 201 is located in the south-west corner of the HLP development precinct. The warehouse building on Lot 201 is to be the largest of the four buildings within the four lots approved under SSD-10436, and as modified under MOD 1. Warehouse 1, like Warehouses 2 and 3 within Lot 201 has direct road access from the access road extending from Johnson Crescent to Old Wallgrove Road. A site plan is provided below at **Figure 7**.

The design of the warehouse, as approved under SSD-10436 and as modified in MOD 1 allows for flexibility in site layout and configuration of the building floor plates to accommodate a range of potential end users. This is reflected in the MOD 1 approval which has separated the singular warehouse building into three tenancies. Jalco is proposed to occupy Warehouse 1. A numerical summary of the Lot 201 area is provided below in **Table 6**.

Table 6 Lot 201 Development Summary as approved by SSD-10436 MOD 1

Development Summary (Lot 201)	Area
Subject Site (Warehouse 1)	36,582 sqm
Idle Space (Warehouses 2 & 3 and Café)	40,728 sqm
Lot Area	77,310 sqm
Efficiency	52.48%
Warehouse 1	19,731 sqm
Main Office 1	536 sqm
Warehouse 1 Drivers Amenities	38 sqm
Warehouse 1 Switch & Compressor Room	140 sqm
Warehouse 1 Storage Area	375 sqm

<b>Development Summary (Lot 201)</b>	<b>Area</b>
Warehouse 2	15,000 sqm
Main Office 2	578 sqm
Warehouse 2 General Waste Area	100 sqm
Warehouse 2 Plant Room	200 sqm
Warehouse 3	3,403 sqm
Main Office 3	415 sqm
Estate Café	60 sqm
Total Building Area	40,576 sqm

### 3.2.2. Physical Internal Tenancy Layout and Design

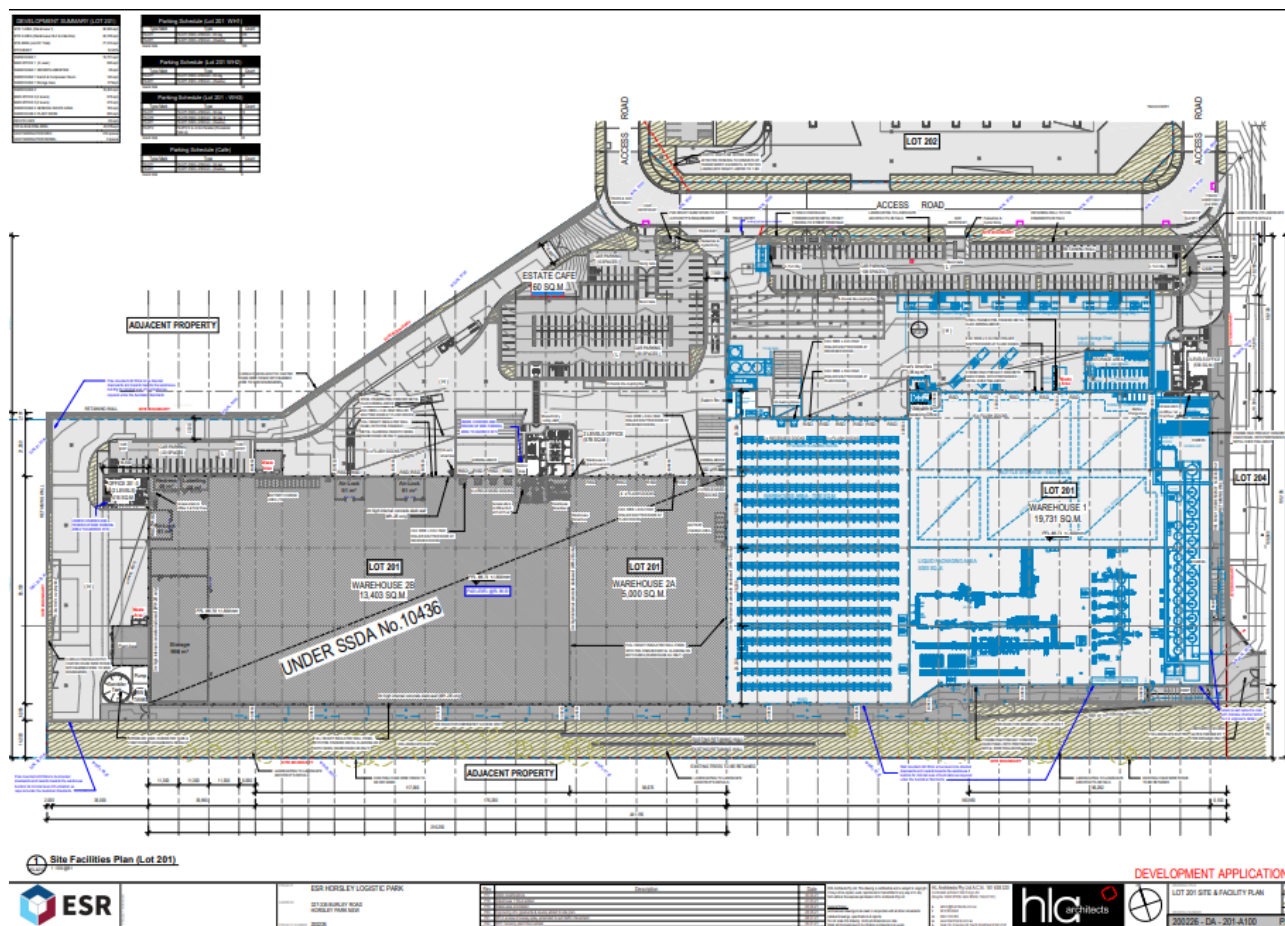
As noted above, the proposed chemical manufacturing facility is to occupy Warehouse 1 on Lot 201 of the HLP. Jalco proposes to undertake fit-out works within the Warehouse 1 facility, whose construction was approved by development consent SSD-10436, as modified by MOD 1. The building and Warehouse 1 tenancy layout has been designed and approved to cater for the proposed Jalco facility.

Noting this, existing development consent on Lot 201 includes approval for the following in relation to Warehouse 1:

- Detailed on-lot earthworks to refine final levels and establish final building pads;
- On-lot stormwater and utility infrastructure and services connection;
- Construction of the Lot 201 Warehouse 1 with ancillary office space, amenities, and storage area;
- Site access to Warehouse 1 including separate car and truck ingress and egress points, hardstand, truck storage area, car parking, and loading areas including recessed and flush docks;
- Ancillary warehouse infrastructure including sprinkler tank, rainwater tanks, and pump room; and
- Landscaping of Lot 201 in accordance with the landscape plan approved under Mod 1.



Figure 7 Overall Lot 201 Warehouse Plan



Source: HLC Architects, 2021

The warehouse building on Lot 201 has previously been designed with external materials and finishes that complement the surrounding natural and built form of the locality. The materials selected, and as approved in the assessment of SSD-10436 are considered to be durable, hardwearing, low maintenance and evoke smart building design.

### 3.2.3. Proposed Warehouse Fit-Out

The proposed fit-out of Warehouse 1 takes into consideration the warehouse layout and facilities as approved under SSD-10436 MOD 1, as well as the operational requirements for the proposed chemical manufacturing facility. The final layout of Warehouse 1 as proposed by this SSD-21190804 comprises the following spaces (approx. areas):

- Automated warehouse – 7,300m<sup>2</sup>
- Dispatch and Receiving office – 30m<sup>2</sup>
- Bottle storage area – 5,400m<sup>2</sup>
- Liquid packaging area – 5,000m<sup>2</sup>
- Workshop – 285m<sup>2</sup>
- Flammable liquid dispensary – 300m<sup>2</sup>
- Product manufacture and packaging area – 1,400m<sup>2</sup>

Outside of the main warehouse there is

- LPG storage area – 375m<sup>2</sup>
- Liquid storage shed – 375m<sup>2</sup>

- Three liquid truck filling bays
- Dissolved Air Flotation (**DAF**) facility

The internal areas will accommodate the following machinery and storage tanks:

<b>Machinery / Storage</b>	<b>Area</b>
15 x BT Tanks – raw material storage 14 x MT Tanks – mixing tanks	East Warehouse Area
16 x Blow moulders for plastic bottle production	North Warehouse Area adjacent dispatch & receiving office
6 Stirred Tanks Filling Lines <ul style="list-style-type: none"> <li>▪ 3 high speed</li> <li>▪ 7 normal speed</li> </ul> Lachenmiere Shrink Wrapper Conveyor belt linked to storage / warehouse area	Liquid Packaging Area
Swisslog Ventura Pallet Stacker Crane system (automated crane system) Multi storey racking Powder Staging Rows / Pallets	Warehouse Area
Liquid storage in drums. Fit-out bunded and constructed of walls with FLR of 240/240/240	Flammable Liquid Dispensary
DGs Storage - Acetylene, argon and oxygen storage racking	Liquid Storage Shed
2 x Flammable Storage Containers Cardboard Compactor	External

Further detail on each of the above area is provided below:

[illegible]

37

### 3.2.4. Use and Operation

#### Land Use

The proposal is seeking to change the approved land use for Warehouse 1 from a warehouse and logistics facility, as approved under SSDA-10436, to a *General Industrial* use to facilitate the delivery of the proposed manufacturing facility. Associated *warehouse and distribution* is also proposed within the tenancy as ancillary to the primary *General Industrial* use.

*General Industrial* is defined as an *Industry* under the *Standard Instrument—Principal Local Environmental Plan (2006)*, the proposal thereby is not only permissible, but it directly aligns with the zoning objectives under the WSEA SEPP, as per **Appendix C** and **Table 10** of this report.

The proposed manufacturing facility is located on land within the HLP and offers a unique opportunity for Jalco to maximise their operational potential, as was detailed above in **Table 2**. Given the site's location in proximity to a number of Sydney's major road networks, as well as the nature of the neighbouring developments within Lot 201, Jalco is able to leverage off the site's existing capabilities, including vehicle access to the site for delivery of chemicals and materials through to the movement of finished products to customers and suppliers.

#### Proposed Operation

The operation is proposed to operate 24 hours a day, 7 days a week.

An overview of the operational procedure associated with the manufacturing process is detailed below, with the tenancy layout provided in **Figure 7**.

The layout of the tenancy fit-out is divided into 'zones' reflecting the various stages of the manufacturing process.

##### Stage 1 – Receival

The Jalco fit-out incorporates a section of the warehouse that will store raw materials which enter from the eastern side of Warehouse 1 via pump lines from the truck filling bays on the northern hardstand. The pump lines connect to the storage tanks and are able to divert different liquid raw materials to specific storage tanks.

The raw materials used for the manufacture of the liquid detergent products are to be stored in this section of the tenancy across 15 x "BT" tanks on the eastern side of the warehouse ranging in capacity from 30 to 70kl.

As detailed within the Dangerous Goods Report (**Appendix J**), the raw substances utilised in the manufacturing of products that are considered DGs are separately banded based upon DG class and compatibility. Adequate distances between incompatible substances are to be measured to mitigate against potential dangers.

Pre-made bottles are received on site with final production via the bottle blow-moulder to expand into regular sized bottles. The manufactured bottles are manually loaded onto pallets, which are then transferred to the bottle storage area.

##### Stage 2 – Mixing

Raw materials stored in the "BT" tanks (ranging from 30KL to 70KL) are then mixed in the adjacent 14 x "MT" mixing tanks of 12KL to 50KL capacity.

The Dangerous Goods Report notes that while several of the raw ingredients are flammable and/or combustible, during the mixing process the materials are diluted such that upon completion of mixing, and prior to processing through packaging, the contents are no longer considered DGs due to the high-water content.

##### Stage 3 – Bottling

The mixed end product is then pumped to the bottling facility.

The empty bottles are manually loaded onto the lines, which are then automatically filled. The high-speed filling lines are capable of filling 90 bottles per minute. The normal-speed filling lines are capable of filling 12-40 bottles per minute. Bottles are manually

## Stage 4 – Storage and Distribution

The filled packages are manually loaded onto a conveyor belt to be sent to the automated warehouse storage.

The storage system uses a Swisslog Vectura pallet stacker crane to efficiently store the packaged final products prior to dispatch. This crane uses robotic technology to lift pallets onto multi-storey racking, allowing increased storage capacity. The system is fully automated ensuring personnel are not required to access the automated warehouse. The system has been designed to efficiently move product within the warehouse and includes brake to energy efficiency measures (i.e. when slowing brake energy is used to raise the load or lowering a package is used to drive the crane forward).

### **Production Capacity**

It is intended that the operation will produce the following quantities of chemical liquid:

- 1000T expected in May 2022,
- Additional, 1000T expected in September 2022 (2000T),
- Additional 1000T in June 2023 (3000T),
- Additional 1000T in December 2024 (4000T).

### **Dissolved Air Flotation**

Dissolved Air Flotation (**DAF**) tanks are used for wastewater treatment. The DAF facility is located immediately outside the warehouse, adjacent to the LPG tanks and the pump room. The DAF includes a 40-kL balance tank, 20-kL sludge tank and a 20-kL overflow tank. The tanks will be dosed with Class 8 DGs, which will be stored in IBCs. The tanks are bundled in a 122-m<sup>2</sup> area.

### **LPG Tanks**

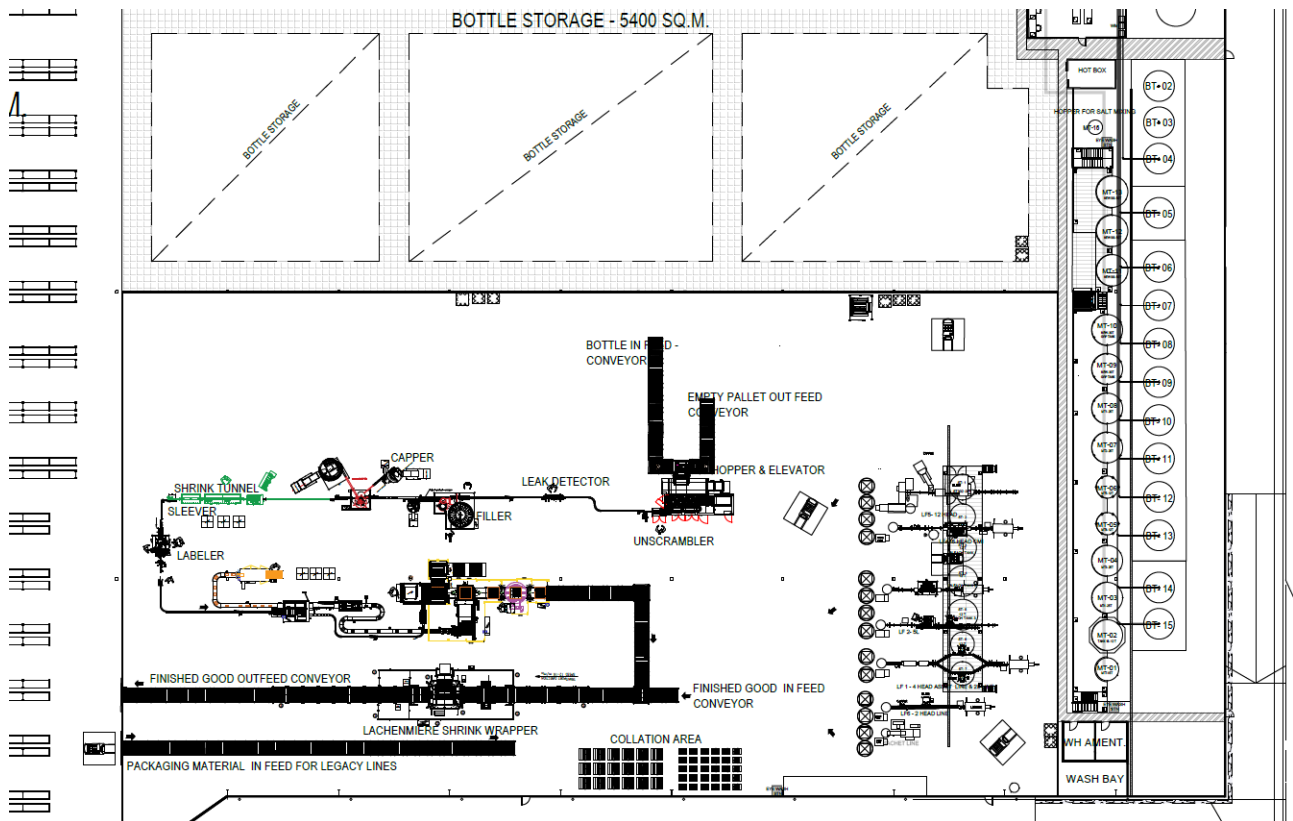
The LPG tank will be used for filling forklifts which will be used within the warehouse. The LPG tank will be stored outside the warehouse next to the loading docks and DAF facility. The tank will have a volume of 4,300-L water capacity and will be separated from other DGs and protected places.

### **Workshop**

The workshop is located adjacent to the bottle storage area. The workshop will be used for general repairs of equipment. Minor quantities of acetylene, argon and oxygen will be stored in the workshop.

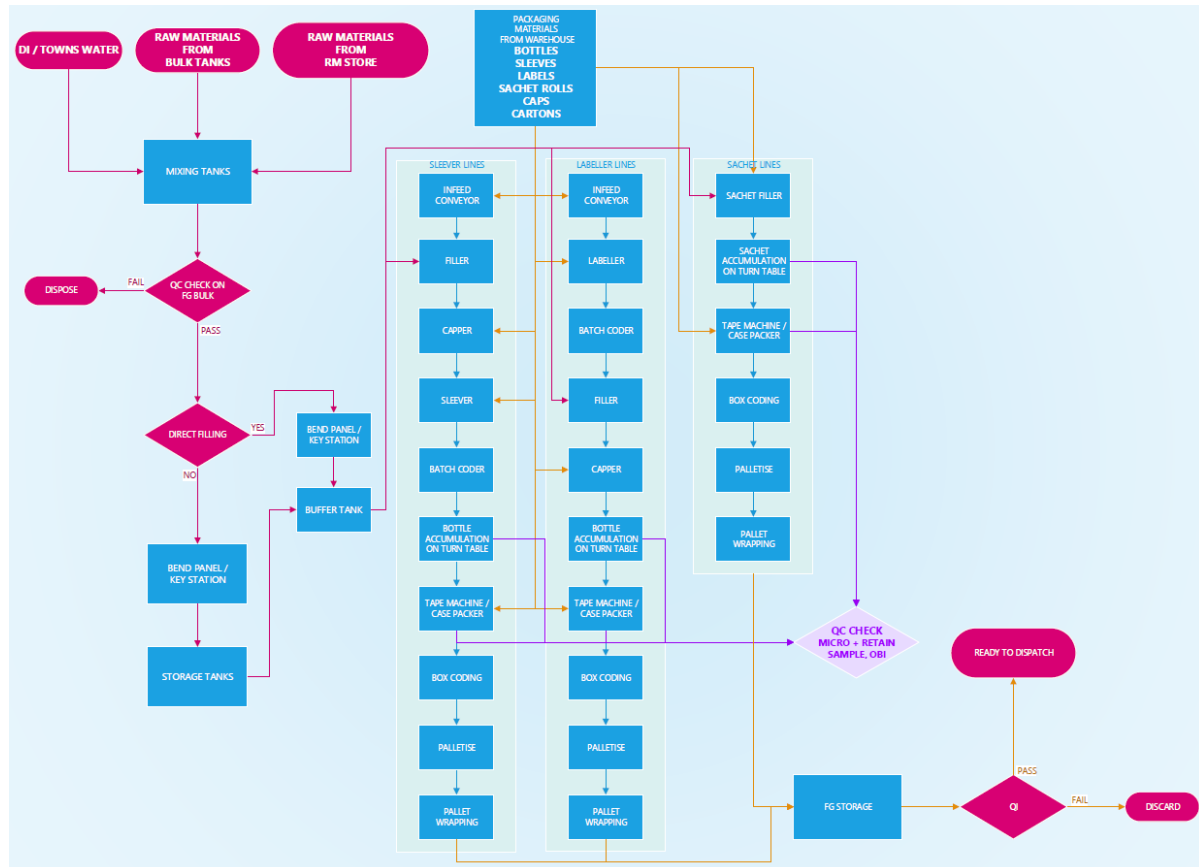
An extract of the warehouse internal layout identifying the proposed plant and equipment is available in **Figure 9**, whilst an operational process map is provided below in **Figure 10**. A copy of the liquid flow diagram, liquid process map, operational process map and process map for liquid site is available at **Appendix S** of this EIS.

Figure 9 Detail of Proposed Equipment



Source: Jalco, 2021

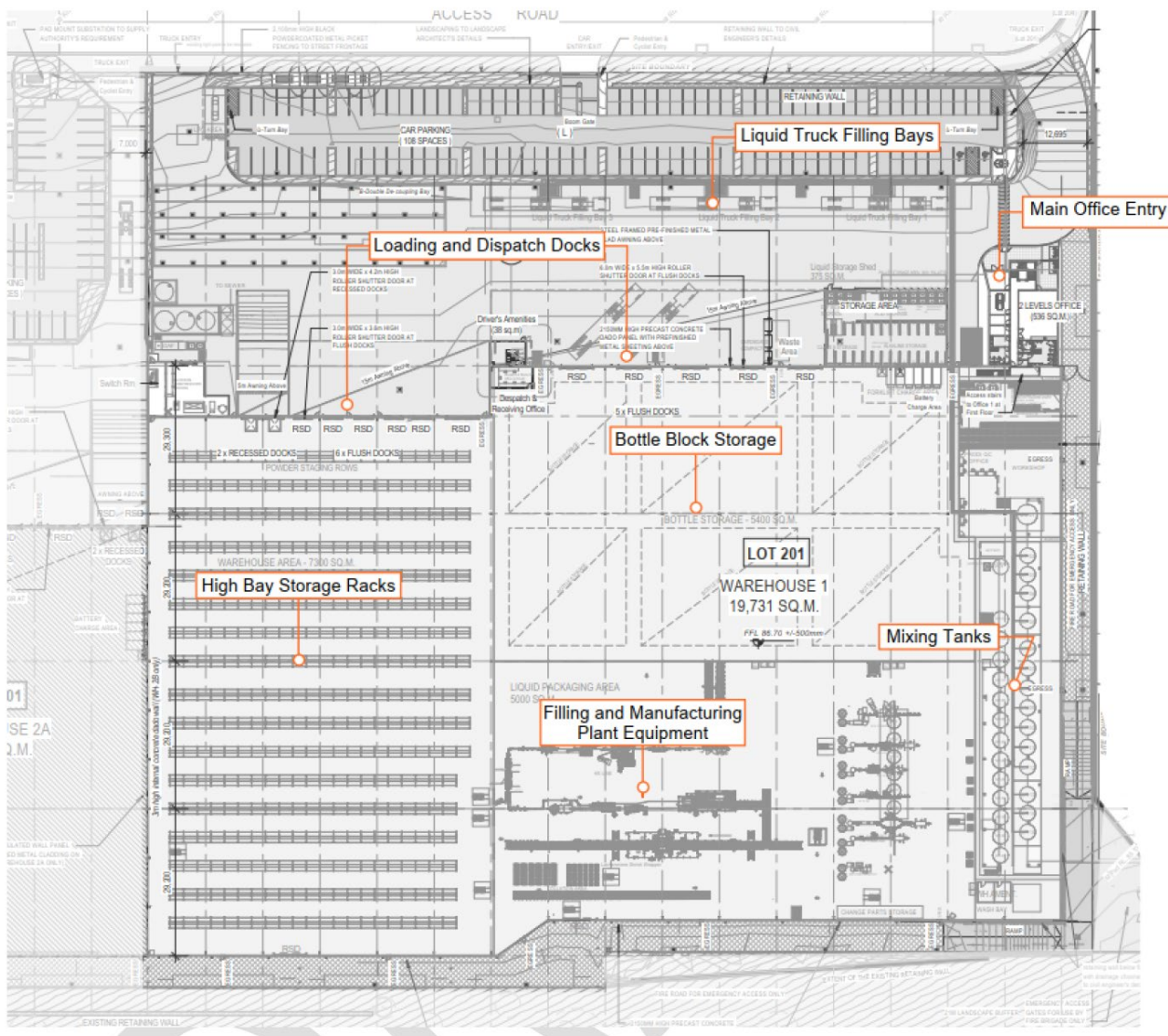
Figure 10 Operational Process Map



Source: Jalco, 2021



Figure 11 Proposed Tenancy Layout



Source: Jalco, 2021

### 3.2.5. Timing

The fit-out and minor construction works are to be undertaken in a single stage following completion of the building works for Lot 201 Warehouse under SSD-10436. These works are expected to be completed in April 2022.

Construction of the liquid storage shed will occur simultaneously with the internal warehouse fit-out works and installation of the bulk liquid transfer pipes from the liquid truck filling stations to the internal storage tanks.

Testing and commissioning of equipment within the warehouse will take place following fit-out completion.

Occupation and operation of the tenancy will occur following equipment commissioning.

Overall the construction/fit-out, commissioning and operation of the site is expected at the following timeframes:

- Construction & fit-out works – 12 weeks completion April 2022
- Equipment testing & commissioning
  - 8 weeks completion in May 2022 – Legacy lines transferred from Smithfield
  - 12 weeks completion in September 2022 – High Speed Filling Lines

- Operation – expected commencement date
  - May 2022 – Legacy Lines transferred from Smithfield
  - September 2022 – High Speed Filling Lines



## 4. STATUTORY CONTEXT

This section of the report provides an overview of the key statutory requirements relevant to the site and the project. It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions, and mandatory considerations.

### 4.1. STATUTORY CONTROLS

**Table 7** categorises and summarises the relevant requirements in accordance with the DPIE's *Preparing an Environmental Impact Statement - State Significant Development Guidelines (July 2021)*.

Table 7 Identification of Statutory Requirements for the Project

Statutory Relevance	Action
Power to grant approval	<p>The EP&amp;A Act establishes the framework for the assessment and approval of development and activities in NSW. The EP&amp;A Act also facilitates the making of environmental planning instruments which guide the way in which development should occur across the State. This is inclusive of State environmental planning policies and local environmental plans.</p> <p>Section 4.36 of the EP&amp;A Act provides for a process where development can be declared SSD either by a SEPP or Ministerial order published in the Government Gazette. Section 4.37 of the EP&amp;A Act provides that the Minister is the consent authority for SSD. Part 4, Division 4.7 of the EP&amp;A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. The proposal is subject to section 4.38 Consent for State Significant Development.</p> <p>The proposed development is appropriately categorised as SSD under Schedule 1, Clause 10 of the <i>State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)</i>, as it is “Chemical, manufacturing and related industries” development that:</p> <p>(2) <i>Has a capital investment value of more than \$30 million for the purpose of the manufacturing of reprocessing of the following (not including labelling or packaging)—</i></p> <p style="padding-left: 40px;">a. <i>Soap, detergent or cleaning agents</i></p> <p>The proposal meets the criteria for SSD declaration in accordance with the above clause as the proposal has an estimated CIV of \$33,970,490. Refer to the Quantity Surveyors report lodged as <b>Appendix I</b>. As such, the Minister for Planning and Public Spaces is the consent authority.</p>
Permissibility	<p>The site is located on land to which the WSEA SEPP applies. The WSEA SEPP provides a framework to guide the efficient release and development of employment lands. The WSEA SEPP zones the land and establishes core development controls and design principles as well as setting the framework for regional infrastructure contributions.</p> <p>The site is zoned IN1 General Industrial under the WSEA SEPP. Development for the purpose of General Industry is permissible with consent within the IN1 General Industrial zone pursuant to the provisions outlined within Part 2 clause 11 of the WSEA SEPP.</p>

Statutory Relevance	Action
Other approvals	<p>Schedule 1 clause 8(2) of the <i>Protection of the Environment Operations Act 1997 (POEO Act)</i> notes that production of soap and detergent products is to be declared a scheduled activity if the facility has a capacity to produce more than 5,000 tonnes of soap and detergent a year.</p> <p>Given the proposal would produce an approximate 180,000,000 litres of soap and detergent products a year, the proposal is triggered as a scheduled activity, and thereby an Environmental Protection License will be required for the operation of the proposal.</p>

## 4.2. PRE-CONDITIONS TO APPROVAL

**Table 8** Outlines the relevant pre-conditions to exercising the power to grant development approval.

Table 8 Pre-Conditions to Approval

Statutory Reference	Pre-Condition	Relevance	Section of this EIS
Pre-condition to exercising the power to grant approval	A consent authority must be satisfied that the land is suitable in its contaminated state - or will be suitable, after remediation - for the purpose for which the development is proposed to be carried out.	Contamination issues across the broader HLP were considered and resolved as part of the previous development applications across the site. As such potential site contamination is not expected to preclude the proposed development at the site.	Refer to <b>Section 6.2.1</b> in the Assessment of Impacts chapter of this EIS.

## 4.3. MANDATORY MATTERS FOR CONSIDERATION

**Table 9** outlines the relevant pre-conditions to exercising the power to grant development consent.

Table 9 Mandatory Considerations

Statutory Reference	Mandatory Consideration	Section in this EIS
<b>Consideration under the EP&amp;A Act and Regulation</b>		
Section 1.3	Relevant objects of the EP&A Act	<b>Appendix C</b>
Section 4.15	Relevant Environmental Planning Instruments: <ul style="list-style-type: none"> <li>State Environmental Planning Policy (State &amp; Regional Development) 2011</li> <li>State Environmental Planning Policy (Western Sydney Employment Area) 2009</li> <li>State Environmental Planning Policy (Infrastructure) 2007</li> </ul>	<b>Appendix C</b>

Statutory Reference	Mandatory Consideration	Section in this EIS
	<ul style="list-style-type: none"> <li>State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017</li> <li>State Environmental Planning Policy No. 33 – Hazardous and Offensive Development</li> <li>Fairfield Local Environmental Plan 2013</li> </ul>	
	Development Control Plans: <ul style="list-style-type: none"> <li>WSEA - Fairfield Development Control Plan</li> </ul>	Appendix C
	The likely impacts of the development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 6
	The suitability of the site for the development,	Section 7.3.7
	The public interest.	Section 7.3.9
<b>Mandatory Relevant Considerations Under Environmental Planning Instruments</b>		
WSEA SEPP	<ul style="list-style-type: none"> <li>Objectives and land use for IN1 General Industrial</li> <li>Part 5 – Principal Development Standards</li> <li>Part 6 – Miscellaneous Provisions</li> </ul>	Appendix C
SEPP 33 – Clause 8	Departmental Guidelines: <ul style="list-style-type: none"> <li>Applying SEPP 33 (identify relevant requirements)</li> </ul>	Appendix C Section 6.1.4
<b>Considerations Under Other Legislation</b>		
Biodiversity Conservation Act 2016 – Section 7.14	As evidenced at <b>Appendix R</b> , the Planning Secretary of the Department of Planning, Industry and Environment and the Chief Executive of the Environment, Energy and Science Group of the Department have determined that the proposed development is not likely to have any significant impact on biodiversity values and that a BDAR is therefore not required to accompany any application for development consent.	Appendix R
<b>Development Control Plans</b>		
WSEA - Fairfield Development Control Plan ( <b>WSEA FDCP 2016</b> )	<p>Clause 11 of the SRD SEPP states the development control plans (whether made before or after the commencement of this Policy) do not apply to SSD.</p> <p>As such, there is no requirement for assessment of the proposal against the relevant identified DCPs for this SSDA. Notwithstanding this, consideration will be given</p>	Appendix C

Statutory Reference	Mandatory Consideration	Section in this EIS
	to the relevant controls and objectives of the identified DCPs.	

Clause 23 of the WSEA SEPP relates to development that adjoins residential land and applies to land that is within 250m of land zoned primarily for residential purposes. The clause requires that the consent authority cannot grant consent to development unless the objectives of Clause 23 are considered.

The HLP, of which Lot 201 is located adjoins rural residential lands to the south and east which include some residential dwellings. The provisions of Clause 23 are therefore triggered in relation to development on the HLP within 250m of the southern and eastern boundaries. Consideration of the detailed requirements of Clause 23 of the WSEA SEPP in relation to the Proposal is provided below in **Table 10**, as well as within the Statutory Compliance Table, submitted as **Appendix C**, as per the requirements of the Rapid Assessment Framework.

Table 10 Clause 23 WSEA SEPP Compliance

Requirement	Response
Wherever appropriate, proposed buildings are compatible with the height, scale, siting and character of existing residential buildings in the vicinity.	<p>This provision requires development within the WSEA that is visible from residential areas to be compatible with the height scale and character of these residential buildings, that goods, plant, and other such elements be screened from view and that the facade of buildings exposed to view present in an appropriate way that preserves an acceptable level of visual amenity.</p> <p>Acceptable solutions to address compatibility (as supported by planning and legal principles) include the siting and scale of buildings, architectural design, and façade treatments and/or landscaping of sufficient density to create a visual buffer.</p> <p>The proposed facility intends to occupy a previously approved warehouse building (as modified) that responds to its local context as it has been designed in respect to the E2 Environmental Conservation land along the eastern border of the site. The E2 Zone is a natural feature that provides a vegetated buffer and an appropriate screen to the rural residential lots to the east of the site.</p> <p>The proposal will occupy Warehouse 1 as approved and will not cause any changes to the approved building heights which achieve only the minimum requirements for a modern warehouse building.</p> <p>Furthermore, an accompanying landscape masterplan was prepared to accompany the SSDA for SSD-10436 which proposed and had approved several visual treatments for Lot 201 which will preserve an appropriate outlook and level of amenity for surrounding landowners and adequately addresses the requirements of Clause 23 of the WSEA SEPP. The Landscape Visual Impact Assessment concluded that careful selection of building finishes and colours</p>

Requirement	Response
	combined with proposed landscape planting at the development site, effectively filters and blends the development into its surrounding context. This in turn will help to reduce visual impacts for any sensitive receivers and locations in close proximity to the Proposal.
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.	Goods, plant, and equipment will be stored inside at all times or suitably screened to avoid potential visual impacts in compliance with these requirements. This includes screening from the landscaped bund from view from the residential dwellings to the south. This is as per the approval of SSD-10436 and MOD 1.
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.	<p>The proposal will not be significantly exposed to views from existing dwellings as the proposal is limited to the internal fit-out of a previously approved warehouse building under SSD-10436 (as modified). The DPIE have considered the operational phase of SSD-10436 and approved it as acceptable. The proposed Jalco facility has thereby been considered from a visual perspective by the DPIE.</p> <p>The architectural plans and perspectives submitted with SSD-10436 described and illustrated the appearance of the warehouse building occupying Lot 201. The adopted design balances the functional requirements of a modern warehousing development with the need to maintain an aesthetically appealing outlook for surrounding sensitive users.</p> <p>Architectural features have been used in the design to break up the bulk and scale of the proposed warehouse buildings and proposed colours and materials have been selected to further minimise any potential impact. Further, it is noted that the southern landscape bund and buffer, and the E2 zone which are existing features, will contribute to the screening from view of the buildings from neighbouring residential land.</p>
Noise generation from fixed sources or motor vehicles associated with the development will be effectively insulated or otherwise minimised.	The NIA submitted as <b>Appendix L</b> and as assessed in <b>Section 6.1.2</b> which has concluded that proposed operations will not exceed any of the operational noise limits or sleep disturbance levels, with consideration of the noise-enhancing weather conditions. Furthermore, the identified mitigation measures will effectively maintain the proposals operation at acceptable acoustic levels.
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.	<p>The proposal seeks 24/7 operation. The noise assessment demonstrates that this would not result in significant adverse impacts on surrounding sensitive receivers.</p> <p>Further, traffic and parking analysis (documented in <b>Section 6.1.1</b> and <b>Appendix N</b>) confirms that the proposed parking</p>

Requirement	Response
	<p>levels and traffic generation would not generate adverse impacts on traffic flows on the local or regional road network.</p> <p>All sites will be fenced and secured with sufficient lighting at entrances. Cameras and guards will also be utilised.</p>
<p>The development will provide adequate off-street parking, relative to the demand for parking likely to be generated.</p>	<p>Given a minor non-compliance with the required parking demand for Warehouse 1, a first-principles parking assessment has been undertaken by Ason in <b>Section 6.1.1</b> and is based upon data provided by Jalco that finds the peak parking demand for Warehouse 1 would be 74 spaces at 1:00pm. It should be noted then that the existing parking provision of 108 spaces is sufficient to meet the demand throughout the 24-hour period, including at the park parking demand, where an additional 34 spaces remain available.</p> <p>This first-principles parking assessment is considered an appropriate methodology of assessing the adequacy of the parking provision in this instance noting that the proposed operation has known operational information. The analysis shows that the parking provision is capable of meeting the actual demand of the proposed use of the Site. Please refer to <b>Section 6.1.1</b> of this EIS for the full parking assessment.</p>
<p>The site of the proposed development will be suitably landscaped, particularly between any building and the street alignment.</p>	<p>Landscape plans were submitted and approved under both SSD-104356 and MOD 1 for Lot 201. Key features of the landscaping approach include:</p> <ul style="list-style-type: none"> <li>▪ Warehouse boundary planting, including groupings of trees and blocks of shrubs.</li> <li>▪ Addition of street trees along the Access Road.</li> <li>▪ Periphery landscape areas with similar planting of species to the APZ area along the eastern edge of the site.</li> <li>▪ Bioretention basins with grasses in accordance with Fairfield City Council WSUD Guidelines.</li> </ul> <p>Landscape and visual analysis prepared in respect of SSD-10436 has informed the design of the landscape treatment and confirms that the proposed landscaping response is appropriate to preserve the amenity of surrounding residential areas.</p>

## 5. COMMUNITY AND STAKEHOLDER ENGAGEMENT

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS.

### 5.1. ENGAGEMENT CARRIED OUT

The following groups and individuals were consulted during the preparation of the EIS:

- Residential neighbours located on Greenway Place, Horsley Park and Jacfin Horsley Park, and
- Community and government stakeholders.

The following actions were taken to inform the community regarding the project and seek feedback regarding the proposal:

- Fact sheet emailed to stakeholder,
- Information and feedback hotline and email provided (Dedicated 1800 number and email feedback channels),
- Residents information letter, and
- Letterbox drop.

It is noted that a fact sheet and information letter (attached as Appendix A and B of **Appendix D**), along with an invitation to contact the project team for a face-to-face briefing was also provided via email to the following stakeholders:

- Greenway Place, Horsley Park, and
- Jacfin Horsley Park.

The email was specifically sent to Jacfin representatives on the 25 August 2021 outlining the proposed changes to the Jalco use and fit-out approval at the HLP.

No response or feedback was provided at the point of time of lodging the DA for test of adequacy.

As per the development consent requirements of SSD-10436, ESR will continuously engage with surrounding residents during the life and operation of the project, including Jalco.

The following engagement actions were undertaken the relevant agencies and authorities:

- Fairfield City Council - Continuous written and verbal correspondence with project team members,
- Endeavour Energy - Continuous written and verbal correspondence with project team members,
- Environmental Protection Authority - commenced discussion with EPA for an Environmental Protection Licence at Lot 201, Warehouse 1 (in application process),
- SafeWork NSW - Continuous written and verbal correspondence with project team members,
- Sydney Water - Continuous written and verbal correspondence with project team members,
- Transport for NSW - Continuous written and verbal correspondence with project team members, and
- Energy Environment and Sciences Division – BDAR waiver submitted to EES division. Request was subsequently granted.

### 5.2. COMMUNITY VIEWS

The key issues raised by the community and key stakeholders are summarised in the table below. It is noted that one (1) community member provided feedback to the ESR Engagement feedback line. No comments were received from the relevant agencies/authorities that changed the preparation of the proposed fit-out and use for Jalco.

Table 11 Community Views

Issue	Response
<b>Beyond Scope or Issues Not Relevant to Project</b>	
The height of building for Lot 201 and Lot 204, and its visual obtrusion into the neighbouring residential properties	<p>This was considered during the assessment of the Horsley Logistics Park SSD-10436.</p> <p>There was no concern raised in relation to Jalco's use and operations.</p>



## 6. ENVIRONMENTAL IMPACT ASSESSMENT

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS (**Appendix A**).
- Statutory compliance table identifying where the relevant statutory requirements have been addressed (**Appendix C**).
- Community Engagement Outcomes Report identifying where the issues raised by the community during engagement have been addressed (**Appendix D**).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (**Appendix E**). The structure of mitigation measures is based on the DPIE's hierarchy of approaches for managing impacts identified in the *Draft Environmental Impact Assessment Guidance Series* released by DPE in June 2017 and is presented as recommended within the *State Significant Development Guidelines – Preparing an Environmental Impact Statement*, released by the DPIE in July 2021 as part of the Rapid Assessment Framework.

In addition to the recommended Mitigation Measures, **Appendix E** undertakes an analysis comprising a qualitative assessment consistent with AS/NZS ISO 31000:2009 *Risk Management—Principles and Guidelines* (Standards Australia 2009). The level of risk was assessed by considering the potential impacts of the proposed development prior to application of any mitigation or management measures. In accordance with the SEARs, the Environmental Risk Assessment (**ERA**) addresses the following significant risk issues:

- The adequacy of baseline data;
- The potential cumulative impacts arising from other developments in the vicinity of the Site; and
- Measures to avoid, minimise, offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the environment.

The detailed technical reports and plans prepared by specialists and appended to the EIS of which these recommended mitigation measures originate from are individually referenced within the following sections.

### 6.1. DETAILED ASSESSMENT IMPACTS

This section of the report provides a detailed assessment of the key issues which could have a significant impact on the site and locality. It provides a comprehensive assessment of the relevant issues and the mitigation measures required to avoid, mitigate and/or offset the impacts of the project.

#### 6.1.1. Traffic & Transport

Ason Group was engaged to prepare a Traffic Impact Assessment (**TIA**) to identify and analyse the potential traffic-related impacts associated with the proposal (refer to **Appendix N**). The report has been prepared in accordance with the SEARs issued for the SSDA, consideration of the approval of MOD 1 of SSD-10436, as well as legislative requirements and relevant guidelines, including the *WSEA - Fairfield Development Control Plan (WSEA FDCP 2016)*.

##### 6.1.1.1. Existing Environment

Ason Group completed an initial transport assessment (*AG ref: P1328r02v2, dated 20 July 2020*) supporting the approval of SSD-10436 for the ESR HLP which was approved by the DPIE on the 13 March 2021. MOD 1 which was subsequently lodged with the DPIE for overall design changes to Warehouse 1 and approved on the 4 August 2021 also undertook further analysis of the transport impact, with the proposed traffic and parking rates ultimately supported by the DPIE.

This application, whilst remaining consistent with the overall design changes as approved by MOD 1 is seeking approval for a change of use for Warehouse 1, and thereby further analysis is required to consider the appropriate transport and parking rates for *General Industry* as compared to those approved for the initial *Warehouse and Distribution* land use.

**Table 12** and **Table 13** below highlight the approved traffic and parking rates as endorsed by the DPIE in approval of SSD-10436 MOD 1.

Table 12 SSD-10436 MOD 1 Approved Traffic Rates

Lot	SSD-10436 Approved			SSD-10436 MOD 1			Difference		
	AM	PM	Daily	AM	PM	Daily	AM	PM	Daily
201	107	79	1,145	100	74	1,072	-7	-5	-73
202	82	61	881	82	61	881	-	-	-
203	48	36	516	48	36	516	-	-	-
204	41	30	438	41	30	436	-	-	-2
<b>Total</b>	<b>279</b>	<b>205</b>	<b>2,980</b>	<b>270</b>	<b>200</b>	<b>2,905</b>	<b>-7</b>	<b>-5</b>	<b>-75</b>

Table 13 SSD-10436 MOD 1 Approved Parking Rates

Lot		GFA (m <sup>2</sup> )					Parking Requirement	Parking Provision
		Warehouse	Office	Amenity	Retail	Total		
201	Warehouse 1	19,731	536	553	-	20,820	80	108
	Warehouse 2A/B	15,000	578	-	-	15,878	72	98
	Warehouse 3	3,403	415	-	-	3,818	22	30
	Café	-	-	-	60	60	1	6
	<b>Total</b>	<b>38,134</b>	<b>1,829</b>	<b>553</b>	<b>60</b>	<b>40,576</b>	<b>175</b>	<b>242</b>
202		31,760	1,829	-	-	33,360	146	147
203		18,730	800	-	-	19,530	83	140
204		14,735	1,700	78	-	16,513	92	114
<b>Total</b>		<b>103,359</b>	<b>5,929</b>	<b>631</b>	<b>60</b>	<b>109,979</b>	<b>496</b>	<b>643</b>

Under MOD 1, Warehouse 1 is approved to have a maximum vehicle movement of 100 in the AM, 74 in the PM peak, and up to 1,072 daily vehicle movements, as well as providing up to 108 parking spaces despite having a requirement of only 80.

An assessment of the approved rates in light of the proposed change of use and operation of the chemical manufacturing facility is detailed below in the following sections.

#### 6.1.1.2. Potential Impacts

As this proposal intends to relocate the household liquids manufacturing aspect of the existing Jalco Smithfield facility, the below assessment has been based on operational data recorded by Jalco to ensure a high level of accuracy in relation to traffic operations and staff movements.

## Traffic Impact

Being consistent with the TIA undertaken for SSD-10436 MOD 1, the following traffic generation rates from the *RMS Guide to Traffic Generating Development (RMS Guide)* for warehouse and office land use developments (together) have been adopted as part of the approved SSD studies:

- AM Peak: 0.247 trips per 100m<sup>2</sup> GFA
- PM Peak: 0.182 trips per 100m<sup>2</sup> GFA
- Daily: 2.641 trips per 100m<sup>2</sup> GFA

The approved rates for car trips under MOD 1 include:

- PM Peak: 5 trips per 100m<sup>2</sup> GFA
- Daily: 60 trips per 100m<sup>2</sup> GFA

These above rates combined with the operational information surveyed for the existing Smithfield facility (Appendix B3 of **Appendix N**) have been utilised to populate the below assessment. The surveyed operational data highlights that the traffic generation for Warehouse 1 during the AM and PM Peak would be 21 vehicles per hour and 23 vehicles per hour respectively. These rates have been applied in assessment as presented below in **Table 14**.

Table 14 Lot 201 Traffic Generation – Combined Light & Heavy Vehicle

Lot 201	GFA (m <sup>2</sup> )	AM Peak	PM Peak	Daily
Warehouse 1	20,820	21	23	431
Warehouse 2A	5,578	14	10	147
Warehouse 2B	13,818	34	25	365
Café	60	3	3	36
<b>Total</b>	<b>40,276</b>	<b>72</b>	<b>61</b>	<b>979</b>

Utilising the above rates, Ason have undertaken an assessment of the traffic generation for Lot 201 stemming from this proposal and assessed it against the approved rates of SSD-10436 and its associated MOD 1. The traffic generation assessment is presented below.

Table 15 Proposed Traffic Generation vs Approved

Lot 201 Scenario	AM Peak	PM Peak	Daily
Approved SSD-10436	107	79	1,145
SSD-21190804	72	61	979
<b>Difference</b>	<b>-35</b>	<b>-18</b>	<b>-166</b>
Approved SSD-10436 MOD 1	103	77	1,106
SSD-21190804	72	61	979
<b>Difference</b>	<b>-31</b>	<b>-16</b>	<b>-127</b>

As detailed above in **Table 15**, the anticipated traffic generation from the Jalco facility is to be less than both the approved generation rates under SSD-10436 and its associated MOD 1. Noting this, from a traffic

generation point the proposal represents a better outcome than the approved *Warehouse and Logistics* land use that was approved as part of SSD-10436.

Given this outcome, SSD-21190804 does not warrant any further modelling or additional infrastructure upgrades to accommodate the proposal as the operational impact of what has been proposed is less invasive than what was previously approved and modelled. Noting this, the proposal is able to be supported from a traffic generation perspective.

## Parking

### General Parking

Ason have undertaken an assessment of the on-site parking provisions for both vehicles and bicycles below. When considering appropriate rates against which to assess the parking requirement, Ason has identified the WSEA SEPP and the WSEA FDCP 2016 are the two principal instruments to guide the parking requirement:

- IN1 General Industry zoned land under the WSEA FDCP 2016 – 1 space per 70m<sup>2</sup> Gross Leasable Area (GLA) including ancillary plus 1 space per unit for factory units
- The WSEA FDCP 2016 provides the following with respect to Industrial Retail Outlet – 1 space per 50m<sup>2</sup> GLA

Given no accurate GLA for the proposed development is available, Ason have assessed the application assuming GLA = GFA based on the RMS Guide.

Furthermore, Condition A8 of SSD-10436 and the RMS Guide provide the following parking requirements for general warehouse/distribution centre use:

- Warehouse: 1 space per 300m<sup>2</sup> GFA
- Office: 1 space per 40m<sup>2</sup> GFA

Utilising the above parking rates, and the plans lodged at **Appendix B** to this EIS, the GFA of each of the relevant built form and land use are provided below in **Table 16**.

Table 16 Lot 201 GFA

Land Use	Warehouse 1	Warehouse 2A	Warehouse 2B	Cafe	Total
Warehouse	14,731	5,000	13,403	0	33,134
Office	536	578	415	0	1,529
General Industry	5,000	0	0	0	5,000
Café	0	0	0	60	60
Amenity	553	0	0	0	553
Total	20,820	5,578	13,818	60	40,276

Utilising the rates above, the parking requirements for Lot 201 are detailed below. The available parking amenity is based on the number of approved parking spaces under SSD-10436 MOD 1.

Table 17 Parking Requirements vs Provision

Parking	Warehouse 1	Warehouse 2A Warehouse 2B	Cafe	Total
Requirement	134	88	2	224

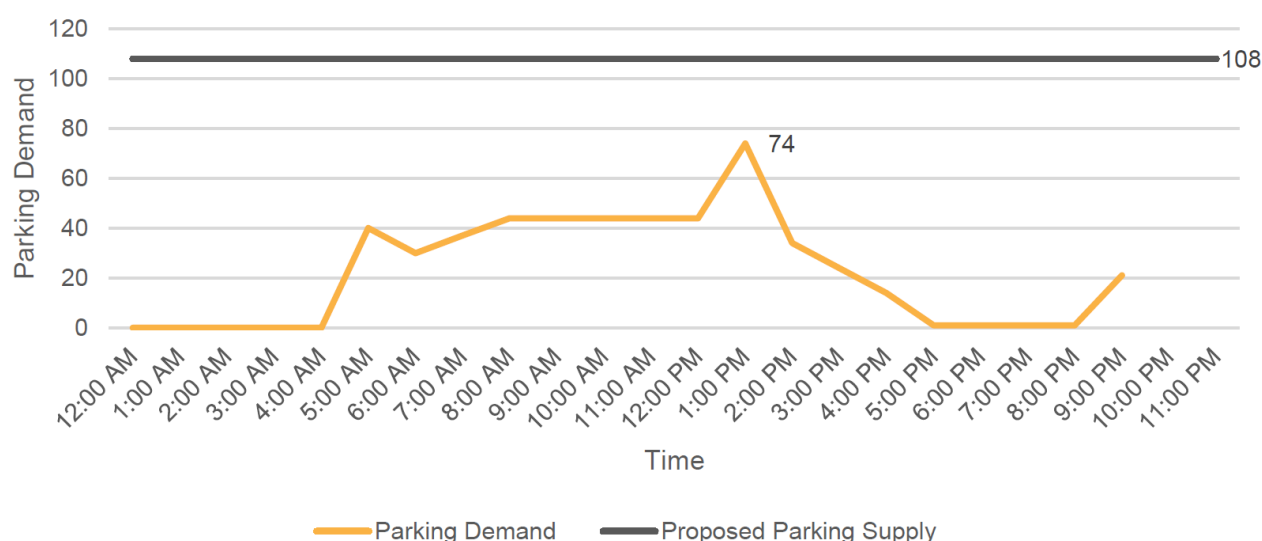
Parking	Warehouse 1	Warehouse 2A Warehouse 2B	Cafe	Total
Provision	108	118	6	232
Difference	-26	+30	+4	+8

As per the findings in **Table 17**, the current proposal is unable to strictly comply with the required rates as outlined in the SSD-10436 conditions of consent and the WSEA FDCP 2016.

In order to further justify why the minor non-compliance with the parking control is suitable, it should be noted that given the recent stay at home orders as a result of the COVID-19 Pandemic, both Jalco and Ason were unable to accurately survey the operational parking requirements at the existing Smithfield facility with recent data.

Despite this, Jalco has provided the hourly light vehicle movements to the site to establish the actual parking demand of the site over a 24-hour period based on a first-principles parking assessment (Appendix B1 of **Appendix N**). **Figure 12** below has been prepared by Ason and highlights the potential parking demand against the overall parking provision of 108 available spaces.

Figure 12 Warehouse 1 Parking Occupancy vs Parking Supply



Source: Ason, 2021

The first-principles parking assessment undertaken by Ason and based upon the data provided by Jalco finds that the peak parking demand for Warehouse 1 would be 74 spaces at 1:00pm. It should be noted then that the existing parking provision of 108 spaces is sufficient to meet the demand throughout the 24-hour period, including at the peak parking demand, where an additional 34 spaces remain available.

This first-principles parking assessment is considered an appropriate methodology of assessing the adequacy of the parking provision in this instance noting that the proposed operation has known operational information. The analysis shows that the parking provision is capable of meeting the actual demand of the proposed use of the Site.

Additionally, in complying with condition B28 of the consent for SSD-10436, ESR are required to lodge a Green Travel Plan prior to receiving an OC for the warehouse building. It is assumed that implementation of that Green Travel Plan will further encourage less usage of private vehicles which will further reduce parking demand.

### Bicycle Parking

Bicycle Parking can be assessed having regard to the *NSW Planning Guidelines for Walking and Cycling*, which requires bicycle parking to be provided at a rate of 3-5% of staff numbers (for long-term use) and 5-10% of staff numbers (for short-term use).

Jalco have advised that the future facility will have up to 60 staff employed during the operational phase. The existing approved parking under SSD-10436 MOD 1 has provision for 8 spaces. Thereby, the overall requirement for two spaces for staff and three for visitors is able to be adequately addressed.

#### End of Trip Facilities

The Walking and Cycling Guidelines provides the following minimum requirements for End of Trip (EoT) facilities on-site for a capacity of 50 – 149 staff:

- Lockers: 1 per 3 racks
- Showers: 4 (2 male and 2 female)
- Change Rooms: 2 (1 male and 1 female)

The requirement and provision for EoT facilities at Warehouse 1 is tabulated below.

Table 18 Warehouse 1 EoT Facilities Proposed vs Required

EOT Facility	Requirement	Provision
Lockers	3	7
Showers	4	4
Change Rooms	2	2

Noting the above, Warehouse 1 complies with the EoT facility requirements, and thereby the site, as approved under SSD-10436 MOD 1 is ultimately considered suitable to accommodate the proposed change of use to a chemical manufacturing facility under SSD-21190804.

#### **6.1.1.3. Mitigation Measures**

The above assessment of the proposal's potential impact to traffic generation and parking has indicated that the proposed Jalco facility would have less of an impact than a *Warehouse and Logistics* use as was previously approved under SSD-10436 and its associated MOD 1.

Assessment of the key issues has indicated there would be no need for internal or external road upgrades of the future HLP development, outside of those already planned for and committed. Furthermore, the access arrangements for Warehouse 1 integrate with those approved under SSD-10436 and MOD 1. However, to remain consistent with the SSD-10436 approval, it is recommended that a Travel Plan (TP) strategy for Warehouse 1 be established and be prepared in line with the Travel Demand Management Strategy as required by TfNSW.

Similarly, it is the intention of Jalco to provide details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan, including a Green Travel Plan and specific Workplace travel plan, and the provision of facilities to increase the non-car mode share for travel to and from the site. It is the intention of Jalco to satisfy this SEARs requirement as a post approval matter and provide the DPIE the plans for approval prior to the issuing of Occupational Certificate.

The TP will assist in mitigating potential impacts of the moderate exceedance over WSEA traffic rates and support the environmental initiative of Council and the wider region.

Similarly, as Lot 201 is to be the first stage constructed of the HLP and operational whilst other Lots are being constructed, Jalco and any future conditions of consent should ultimately consider the proposed mitigation measures put forward under SSD-10436, including:

- Traffic control would be required to manage and regulate traffic movements into and out of the site during construction.
- Disruption to road users would be kept to a minimum by scheduling intensive delivery activities outside of peak network hours.

- Construction and delivery vehicles would be restricted to using Old Wallgrove Road, Lenore Drive, M7 Motorway and Mamre Road.

The above analysis has shown that the proposal is supportable with respect to access, traffic generation and parking requirements, and will not result in unacceptable impacts on the surrounding road network.

## 6.1.2. Noise & Vibration

SLR Consulting was engaged to prepare an Operational Noise Impact Assessment to identify and analyse the any potential acoustic impacts of the proposed operations to the nearest sensitive receivers during all relevant weather conditions (refer to **Appendix L**).

The report has been prepared in accordance with the SEARs issued for the SSDA, consideration of the approval of MOD 1 of SSD-10436, as well as legislative requirements and relevant guidelines. This acoustic assessment has been conducted with consideration that the proposed consumer liquids packaging plant will operate 24 hours a day, 7 days a week. Noise modelling of the development site was undertaken using the CONCAWE noise prediction algorithms in SoundPLAN modelling software.

### 6.1.2.1. Existing Environment

#### Nearest Receivers

The area surrounding the development has been divided into three Noise Catchment Areas (NCAs) which are identified to accommodate residential dwellings and some associated commercial/shed structures. These NCA's are demonstrated in **Figure 13** below. The NCAs operational noise limits are identified in **Table 19** below.

Table 19 Operational Noise Limits

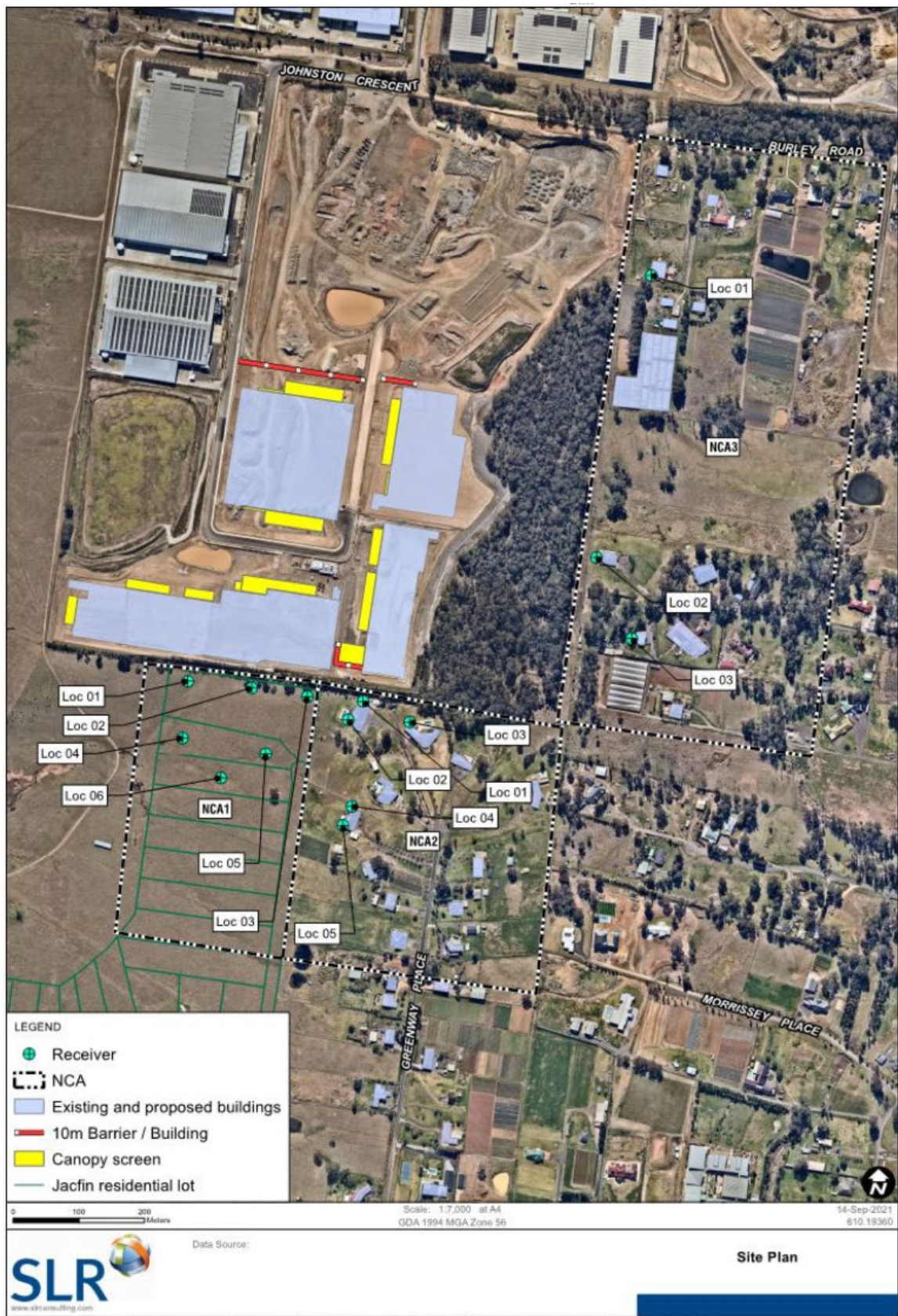
Location	Daytime LAeq(15minute) (dBA)	Evening LAeq(15minute) (dBA)	Night-time LAeq(15minute) (dBA)	Night-time LAFmax (dBA)
NCA1	44	43	38	52
NCA2	40	40	38	52
NCA3	44	43	38	52

#### Weather Conditions

It is identified that the meteorological conditions of the area can affect the existing noise environment. Accordingly, the relevant 12-month weather data from the Bureau of Meteorology automatic weather station at Horsley Park was assessed. It was identified that the 30% threshold for noise-enhancing wind during night-time. As such, these wind impacts are considered in the relevant night-time operations, acoustic assessment.



Figure 13 Noise Catchment Areas





### 6.1.2.2. Potential Impacts

#### Noise Sources

The relevant, major noise sources from the proposed industrial change of use/fit-out that have been appropriately assessed through the noise modelling software are as follows:

- Heavy (HV) and Light Vehicle (LV) road movement and loading movements (day and night activities)
  - HV Loading/Road/Carpark: 96dBA
  - LV Loading/Road/Carpark: 105dBA
- Vehicle hardstand and loading area sources:
  - Truck Reversing Alarm: 107dBA, during 60 second, Peak 15-minute Period
  - Forklift Reversing Alarm: 102dBA, during 90 second, Peak 15-minute Period
  - Gas Forklift: 900dBA, during 900 second, Peak 15-minute Period
- External Point Sources:
  - Rooftop Fans: 93dBA
  - Air Brake: 118dBA
  - Truck Reversing Alarm: 110dBA
  - Forklift Reversing Alarm: 105dBA
  - Car Peak Events: 100dBA
- Internal Point Sources:
  - Liquid Packaging Area Machinery and Infrastructure: 73dBA – 95 dBA
  - Main Warehouse: 75dBA

With consideration of the identified noise sources of the proposed change of use/fit-out, the predicted operational noise levels at the most affected receiver in each catchment are demonstrated in **Table 20** for unmitigated and **The above** results indicate that exceedance of the Operational Noise Limits is predicted at the most affected receivers in noise catchments NCA1 and NCA2 during the night-time period without mitigation.

Compliance with the sleep disturbance screening criterion is predicted, therefore, a detailed maximum noise level assessment is not required. A detailed maximum noise level assessment of external activities was included in the Lot 201 Noise Verification Report (SLR report 610.19360-R07-v0.4).

**Table 21** for mitigated. The model findings identify that the proposed operations will not exceed any of the operational noise limits or sleep disturbance levels, with consideration of the noise-enhancing weather conditions.

Table 20 Predicted Operational Noise Levels – MOD3 Masterplan and Lot 201 Warehouse 1 (Unmitigated)

NCA	Period (weather)	LAeq(15minute) Noise Level (dBA)			LAmax Noise Level (dBA)		
		Operational Noise Limit	Predicted	Compliance	Sleep Disturbance Screening Noise Level	Predicted	Compliance
NCA01	Daytime (neutral)	44	42	Yes	n/a <sup>2</sup>	n/a	n/a
	Evening (neutral)	43	42	Yes	n/a <sup>2</sup>	n/a	n/a
	Night-time (noise-enhancing)	38	42	No	52	47	Yes
NCA02	Daytime (neutral)	40	39	Yes	n/a <sup>2</sup>	n/a	n/a
	Evening (neutral)	40	39	Yes	n/a <sup>2</sup>	n/a	n/a
	Night-time (noise-enhancing)	38	40	No	52	48	Yes
NCA03	Daytime (neutral)	44	36	Yes	n/a <sup>2</sup>	n/a	n/a
	Evening (neutral)	43	36	Yes	n/a <sup>2</sup>	n/a	n/a
	Night-time (noise-enhancing)	38	37	Yes	52	49	Yes

Source: SLR, 2021

The above results indicate that exceedance of the Operational Noise Limits is predicted at the most affected receivers in noise catchments NCA1 and NCA2 during the night-time period without mitigation.

Compliance with the sleep disturbance screening criterion is predicted, therefore, a detailed maximum noise level assessment is not required. A detailed maximum noise level assessment of external activities was included in the Lot 201 Noise Verification Report (SLR report 610.19360-R07-v0.4).

Table 21 – Predicted Operational Noise Levels – MOD3 Masterplan and Lot 201 Warehouse 1 (Mitigated)

NCA	Period (weather)	LAeq(15minute) Noise Level (dBA)			LAmax Noise Level (dBA)		
		Operational Noise Limit	Predicted	Compliance	Sleep Disturbance Screening Noise Level	Predicted	Compliance
NCA01	Daytime (neutral)	44	37	Yes	n/a2	n/a	n/a
	Evening (neutral)	43	37	Yes	n/a2	n/a	n/a
	Night-time (noise-enhancing)	38	38	Yes	52	47	Yes
NCA02	Daytime (neutral)	40	37	Yes	n/a2	n/a	n/a
	Evening (neutral)	40	37	Yes	n/a2	n/a	n/a
	Night-time (noise-enhancing)	38	38	Yes	52	48	Yes
NCA03	Daytime (neutral)	44	36	Yes	n/a2	n/a	n/a
	Evening (neutral)	43	36	Yes	n/a2	n/a	n/a
	Night-time (noise-enhancing)	38	36	Yes	52	49	Yes

Of note, these predicted noise levels are identified with the appropriate noise mitigation methods identified in the Section 6.1.2.3 of this EIS below. The operational noise impacts identified at the nearest residential receivers are consistent with the approved warehouse operations at the Warehouse 1 (Lot 101) approved SSD-10436 Mod-1.

Otherwise, the operational noise emissions from the MOD1 Masterplan and Lot 201 Warehouse 1 internal operations are considered to be compliant with the relevant thresholds.

### 6.1.2.3. Mitigation Measures

The following mitigation measures are identified to be integrated into the building design.

- 18mm marine plywood internal lining fixed to inside of purlins to the Southern elevation of Liquid Packaging Area. The plywood lining is required have a minimum surface density of 10 kg/m<sup>2</sup> and form a continuous layer to the full height of the 0.48mm steel external wall.
- Four-sided enclosure to rooftop fans, minimum enclosure height 1.0m above fan height.

- Acoustic louvres to the Southern elevation of Liquid Packaging Area, specified as NAP 300 H-line, Fantech SBL1 or equivalent.

The following additional noise mitigation measures have been implemented for Lot 201 Warehouse 1 during the night-time period:

- The use of non-tonal reversing alarms for all vehicles and forklifts accessing the loading and hardstand areas.
- Electric forklifts are proposed to be used for all external and internal operations to reduce noise compared to gas forklifts.
- The maximum SWL of occasional impact sounds in the Waste Area is considered unlikely to exceed the modelled heavy vehicle air brake SWL of 118 dBA and these activities are therefore covered by the sleep disturbance screening assessment.

The noise mitigation measures associated with other Lots included in the model are summarised below:

- Rooftop plant screening for Lot 201 Warehouse 2A & 2B in accordance with MOD3 masterplan.
- Infill noise wall to southern and western eave height of Lot 204 super canopy.
- Rooftop plant screening to southern and eastern elevations of other Lots.

Lot 204 infill noise wall is included in the noise model primarily to provide screening of noise sources associated with Lot 204 itself, along with a residual screening benefit to external sources associated with other Lots.

Additionally, an Operation Noise Management Plan for Lot 201 should be provided prior to occupancy. Otherwise, the operational noise modelling identifies that the noise sources from the proposed industrial, consumer liquids packaging plant will not exceed the relevant, acoustic thresholds and they will not result in any adverse acoustic impacts to the nearby residential receivers.

### 6.1.3. Fire & Incident Management

Affinity Fire Engineering (**Affinity**) was engaged to prepare a Fire Safety Strategy (**FSS**) (attached at **Appendix K**) to assess the fire safety engineering performance requirements presented in the Deemed-to-Satisfy provisions of the Building Code of Australia (**BCA**) 2019 Amendment 1. The report summarises the fire protection systems provided for Warehouse 1 as approved under SSD-10436, and additional fire management provisions proposed by Jalco for the operation of the chemical manufacturing facility.

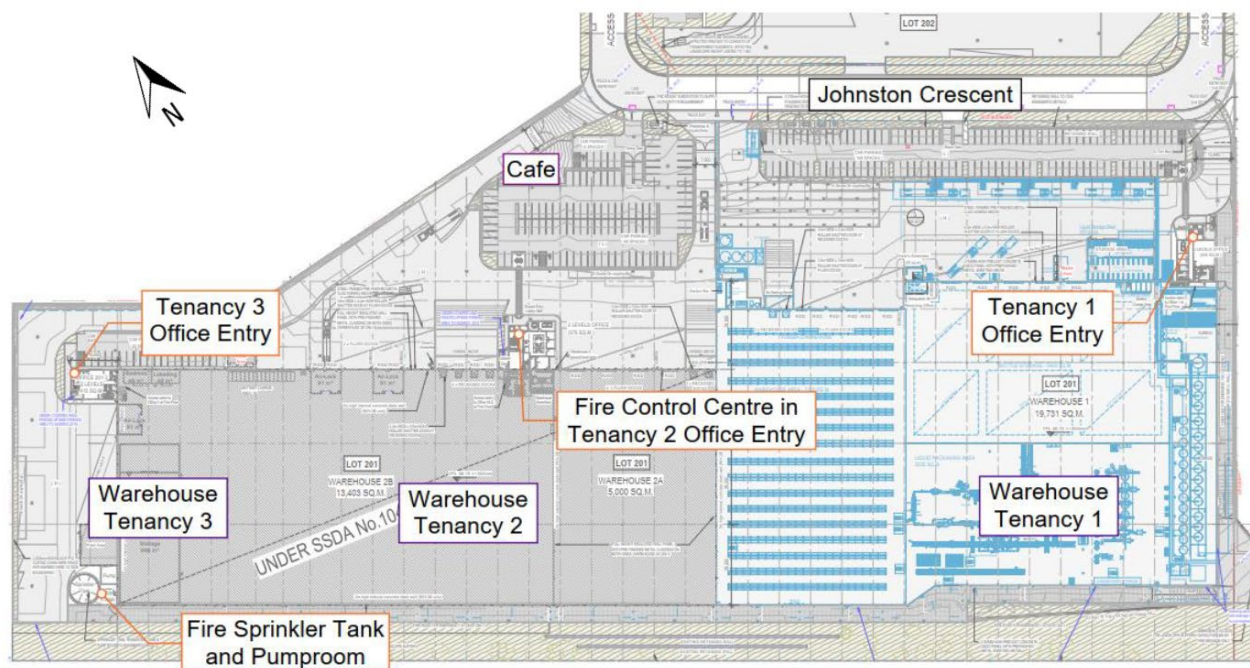
#### 6.1.3.1. Existing Environment

When undertaking the FSS assessment, Affinity have considered Warehouse 1's existing environment in relation to Fire and Rescue operations, both in the wider regional context and the fire protection measures approved within SSD-10436.

The subject site is considered reasonably close to nearby FRNSW stations given Horsley Park is generally considered a semi-rural suburb, being located 11km north-west of Fairfield. Despite this the two nearest fire brigade stations are Bonnyrigg Heights and Huntingwood, approximately 14km and 9km from the site respectively.

As approved under SSD-10436, and subsequently modified under MOD 1, Lot 201 has an emergency vehicular access road provided around the perimeter of the lot, as well as fire sprinkler services infrastructure located in the south-west of the site, adjacent to Warehouse 3. The Fire Detection Control and Indicating Equipment (**FDCIE**) is to be located within a dedicated room within the main entry to Warehouse 1, which also forms part of the Fire Control Centre for the building.

Figure 14 Lot 201 Fire Service Infrastructure



Source: Affinity, 2021

### 6.1.3.2. Potential Impacts

As part of the FSS, Affinity have undertaken an analysis of the likely hazards associated with the proposed chemical manufacturing facility within Warehouse 1. The below sections undertake a review of these potential hazards, whilst **Section 6.1.3.3** details the proposed fire safety strategy by Affinity, with particular regard for proposed equipment and processes to mitigate and manage against threat of fire.

The following list of hazards have been identified by Affinity:

- Fire Hazards:
  - Building Layout & Egress – Due to the building's extensive floorplate, extended travel distances to the nearest exit and between alternative exists is a threat in the event of an emergency.
  - General Activities – In the event of an emergency, the plant's general operation which includes regular hot form plant equipment, potentially noisy environment, and the presence of several flammable and toxic materials, exasperates further risk.
- Dangerous Goods – Several DGs are to be stored on site that are utilised in the chemical manufacturing process for Jalco products. A full description of these chemicals and the extent of the threat they present in undertaken in **Appendix J**.
- Rooftop Solar Panels – Solar photovoltaic systems contribute to an increased probability of a fire event, primarily due to electrical risks. Additionally, in a fire event an attending fire brigade can be exposed to hazardous toxins from the combustion of the panel materials.

Overall, the proposal is considered to be generally complainant and safe with regard to fire and incident management. Warehouse 1, as approved under SSD-10436 MOD 1 was endorsed by the DPIE on the 4 August 2021, and similarly, the wider SSD-10436 approval which included concurrence from the Rural Fire Service (**RFS**) and Fire & Rescue NSW (**FRNSW**) supports the overall fire and emergency access for Warehouse 1.

Further detailed discussion of the risk of fire from the operation and associated chemicals is undertaken below in **Section 6.1.4**.

### 6.1.3.3. Mitigation Measures

Affinity have detailed a proposed fire safety strategy to address the specific hazards identified within the proposed development. The following is proposed:

Table 22 Proposed Fire Safety Strategy

Mitigation Measure	Detail
<b>Passive Fire Construction</b>	
Fire Resisting Construction	All modification and any new works to the building structure including floors, walls, columns and shafts shall be constructed in accordance with the requirements of BCA Clause C1.1, Specification C1.1 for Type C Construction.
Separation of Equipment	<p>Rooms containing the following equipment must be fire separated from the remainder of the building by construction in accordance with Specification C1.1 or 120/120/120 FRL construction:</p> <ul style="list-style-type: none"> <li>▪ Lift monitors and lift control panels</li> <li>▪ Emergency generators used to sustain emergency equipment operating in emergency mode</li> <li>▪ Central smoke control plant</li> <li>▪ Boilers</li> <li>▪ A battery system installed in the building that have a total voltage of 12 volts or more and storage capacity of 200kWh or more</li> </ul>
Finishes & Linings	Where practicable, internal finishes, internal linings and internal materials used throughout the building should be non-combustible to reduce the spread of fire and the generation of toxic smoke products.
External Claddings	All modification and any new works to the external cladding forming the building must comply with the DTS provisions of the BCA as defined by BCA Specification C1.1. Aluminium composite panels ( <b>ACP</b> ) containing a polyethylene (PE) core should not be used on the façade.
Insulated Sandwich Panels	<p>Where the tenancy fit-out contains temperature-controlled areas with Freezers and Cool Rooms and the like, these enclosures shall be constructed using Insulated Sandwich Panels (ISP) that meet the following requirements to ensure a suitable degree of fire mitigation:</p> <ul style="list-style-type: none"> <li>▪ All sandwich panels must be installed in accordance with the "Insulated Panel Council Australasia (IPCA) Code of Practice (CoP) - Version 4.3".</li> <li>▪ The panels must be installed by an accredited installer as recognised by the Code of Practice prepared by IPCA.</li> <li>▪ Certification must be provided from the accredited installer prior to final occupation certificate being issued for the building.</li> <li>▪ All future works, modifications or repairs must be completed using ISP with the same core and material type.</li> </ul>

Mitigation Measure	Detail
	<ul style="list-style-type: none"> <li>Signage and block plans will be required around the site adjacent to each sprinkler and hydrant block plan to alert fire fighters to the following: <ul style="list-style-type: none"> <li>Location of all sandwich panels installed.</li> <li>Type of sandwich panels installed (commercial brand and core material).</li> </ul> </li> </ul>
Rooftop Solar Panels	<p>Where panels are installed on the warehouse roof, the following must be provided:</p> <ul style="list-style-type: none"> <li>Minimum A3 sized block plan shall be provided at the Main FDCIE and Fire Pump Room to alert attending FRNSW personnel on the operational aspect of the plant and the chemical risk, as well as location of isolation switches.</li> <li>Where solar panels are designed to be automatically isolated on fire trip, signage shall be provided at the Main FDCIE and Fire Pump Room detailing this provision that can clearly be identified by attending fire brigade.</li> </ul>
Smoke-Proof Construction	All shared walls and ceilings/roofs between the offices and warehouse parts of the building shall meet the smoke proofing construction requirements of BCA Specification C2.5 – Clause 3.
<b>Egress Provisions</b>	
Alarm & Evacuation Strategy	<p>Activation of any sprinkler head, smoke detector or manual call point shall initiate the building occupant warning alarm tones throughout the building of alarm origin.</p> <p>Given the presence of dangerous goods, any fire alarm signal in the building should initiate throughout all areas of all tenancies immediately.</p> <p>Dedicated fire wardens shall ensure that all clients, visitors, maintenance contractors and staff of Tenancy 1 are promptly evacuated if a fire is identified anywhere in that building.</p>
Egress Provisions	<p>The fire engineering assessment to be undertaken shall address travel distances that have been identified as being non-compliant in the following listed locations of the main warehouse and production areas:</p> <ul style="list-style-type: none"> <li>Up to 95m to an exit in lieu of 40m.</li> <li>Up to 185m between alternative exits in lieu of 60m.</li> </ul>
Door Hardware, Operation & Mechanisms	All doors serving as required exits shall have hardware, door swings, latch operations and signage in accordance with the prescriptive requirements of BCA Clauses D2.19, D2.20, D2.21 and D2.23.

Mitigation Measure	Detail
Signage & Lighting	Exit and emergency lighting is to be provided throughout the building in accordance with the prescriptive DTS provisions of BCA Clause E4.2, E4.4, E4.5, E4.6, E4.8 and AS2293.1:2018.
<b>Active Fire Protection Systems</b>	
Building Alarm & Communication System	<p>All modification and any new works to the building occupant warning system shall be in accordance with the prescriptive requirements of Specification E1.5 and Clause 6 of Specification E2.2a of DTS provisions and AS1670.1:2018.</p> <p>The existing system shall be extended and modified as required to ensure compliant coverage of the system.</p> <p>Activation of the any automatic smoke detector, fire sprinkler head or manual call point shall initiate the Building Occupant Warning System (BOWS) throughout all areas of all tenancies in the building.</p>
Automatic Fire Sprinkler System	<p>All modification and any new works to the fire sprinkler system shall be in accordance with the prescriptive requirements of BCA Specification E1.5 and AS2118.1:2017 Amendment 1.</p> <p>The existing system shall be extended and modified as required to ensure compliant coverage of the system taking into account the storage arrangements, commodities and material processes.</p> <p>The recommendations of the dangerous good consultant must be adopted as detailed in the Riskcon Dangerous Goods Report and Preliminary Hazard Analysis Assessment.</p>
Automatic Smoke Hazard Management Systems	The existing automatic smoke exhaust system shall be modified and extended to cater for the additional fire loads presented by the production equipment and Dangerous Goods in the facility. All modifications and any new works to the system shall be in accordance with the prescriptive requirements of BCA Specification E2.2a and AS1668.1:2015.
<b>Occupant Fire Fighting Facilities</b>	
Fire Hose Reel	<p>The existing fire hose reel system shall be modified and extended to cater for the additional fire loads presented by the production equipment and Dangerous Goods in the facility and the internal fit-out of the tenancy.</p> <p>All modification and any new works to the fire hose reels are to be in accordance with the prescriptive DTS provisions of BCA Clause E1.4 and AS2441:2005.</p>
Portable Fire Fighting Equipment	<p>Portable fire extinguishers are to be provided throughout the tenancy in accordance with Table E1.6 of the BCA with the type of extinguisher selected in accordance with AS2444:2001, specifically:</p> <ul style="list-style-type: none"> <li>General office areas – Dry Powder (ABE type) – 2.5kg</li> <li>Computer/server rooms – CO2 – 3.5kg</li> </ul>



Mitigation Measure	Detail
	<ul style="list-style-type: none"> <li>Plant rooms – Dry Powder (ABE) – 2.5kg</li> <li>Designated exists – Dry Powder (ABE) – 4.5kg</li> <li>Adjacent each fire hose reel cabinet – Dry Powder (ABE) – 4.5kg</li> </ul>
<b>Fire Brigade Intervention</b>	
Fire Brigade Alarm Signalling Equipment	An automatic link shall be provided directly to an approved monitoring centre on activation of any automatic smoke detection system, fire sprinkler system or manual call point installed in the tenancy.
Fire Hydrant System	The existing fire hydrant system shall be modified and extended to cater for the additional fire loads presented by the production equipment and Dangerous Goods in the facility and the internal fit-out of the tenancy. All modification and any new works to the fire hydrant system shall be in accordance with the prescriptive requirements of BCA Clause E1.3 and AS2419.1:2005 Amendment 1.
Vehicular Perimeter Access	The existing emergency vehicular perimeter access pathway shall be maintained clear of obstructions to achieve continuous access around the site and through the tenancy dispatch hardstand. Any new works or modifications to the existing hardstand and adjacent building shall ensure that the vehicular access path is maintained no less than 6m clear width and facilitates the turning arc and sweep for both pumper and aerial appliances.
<b>Building Management Procedures</b>	
Maintenance of Fire Safety Equipment	The fire detection systems, fire sprinkler systems, emergency warning systems, fire hydrants, hose reels, portable fire extinguishers, emergency lighting and any other fire safety equipment shall be tested and maintained in accordance with Australian Standard AS1851 or other relevant testing regulatory.
No Smoking Policy	A no-smoking policy shall be implemented and enforced through all internal areas of the building.
Fire Safety Manual	A fire safety manual shall be developed for the site to provide an overview of all fire safety procedures and systems within the building. The manual should also record false alarms, outcomes from fire drills and provide details of the ongoing maintenance and inspection procedures. The manuals should be reviewed annually and a lessons learned exercise undertaken.
<b>Dangerous Goods</b>	
Hot Works Policy	A hot works policy should be put in place and rigorously enforced to ensure that all hot works, including grinding and welding, are managed to avoid the accidental ignition of fires.

Mitigation Measure	Detail
Emergency Management Plan	<p>An Emergency Management Plan (EMP) must be developed in accordance with AS3745:2010. The EMP must:</p> <ul style="list-style-type: none"> <li>▪ Be developed by an emergency planning committee (EPC).</li> <li>▪ Implement emergency control organisation (ECO) procedures for the building.</li> <li>▪ Specifically address the types of emergencies that may arise from the industry and/or activities associated with the business operations.</li> <li>▪ Detail ongoing training, education and execution of the emergency management procedures to be regularly conducted with all building occupants.</li> </ul> <p>An evacuation plan should be developed for the site in accordance with AS3745:2010 and standard fire orders should be displayed throughout the building.</p>
Fire Drills & General Fire Safety Training	<p>All fire wardens are to be trained in first-aid, firefighting and emergency response. All staff shall be inducted with a fire safety brief including the actions necessary on the activation of the building emergency warning system and the location of all emergency egress paths and fire exits. In addition, periodic fire drills should be undertaken and any lessons learned included in future fire safety procedures.</p>

Noting the above recommended mitigation measures, and the ability to address any BCA Deemed-to-Satisfy provisions through the above proposed fire safety strategy, the development has minimal risk as a result of fire incident and management.

As such, the application is able to be supported from a fire and incident management perspective.

## 6.1.4. Hazards & Risk

A *State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33)* assessment report has been prepared by Riskcon Engineering and is attached to this EIS as **Appendix M**. The report reviewed the quantity of dangerous goods proposed to be stored within the site and associated transportation of those dangerous goods under the threshold quantity outlined in the 'Applying SEPP33' guideline.

### 6.1.4.1. Existing Environment

The site is a recently approved industrial precinct, primarily envisioned to be used for the purpose of Warehouse & Logistics. There are no significant commercial office spaces, warehouses open to the public, retail centres or similar developments that routinely have a large number of people occupying them adjacent to the site.

The subject site consists of an office (800m<sup>2</sup>), the automated warehouse and dispatch (7,500m<sup>2</sup>), the bottle storage area (5,400m<sup>2</sup>), liquid packaging area (5,000m<sup>2</sup>), a workshop (285m<sup>2</sup>), flammable liquid dispensary (approximately 300m<sup>2</sup>) and the product manufacture and packaging area (approximately 1,400m<sup>2</sup>).

### 6.1.4.2. Potential Impacts

Given the proposal's intended manufacturing of washing liquids which are considered non-Dangerous Goods (DG) products but utilise raw inputs classified as DGs, Riskcon have undertaken a review of the chemicals stored and used on site. A review of the quantity of goods to be stored indicates the site would exceed the limits listed in the SEPP 33, Ref. [1] which requires the risks associated with a facility storing DGs to be

assessed in the form of a Preliminary Hazard Analysis (**PHA**) to determine whether there is the potential for offsite impacts.

In undertaking the PHA, Riskcon have assessed the proposal whilst considering the following:

- Complete the PHA according to the Hazardous Industry Planning Advisory Paper (HIPAP) No. 6 – Hazard Analysis (Ref. [3]);
- Assess the PHA results using the criteria in HIPAP No. 4 – Risk Criteria for Land Use Planning (Ref. [2]); and
- Demonstrate compliance of the site with the relevant codes, standards and regulations (i.e., NSW Planning and Assessment Regulation 1979, WHS Regulation, 2017 Ref. [4]).

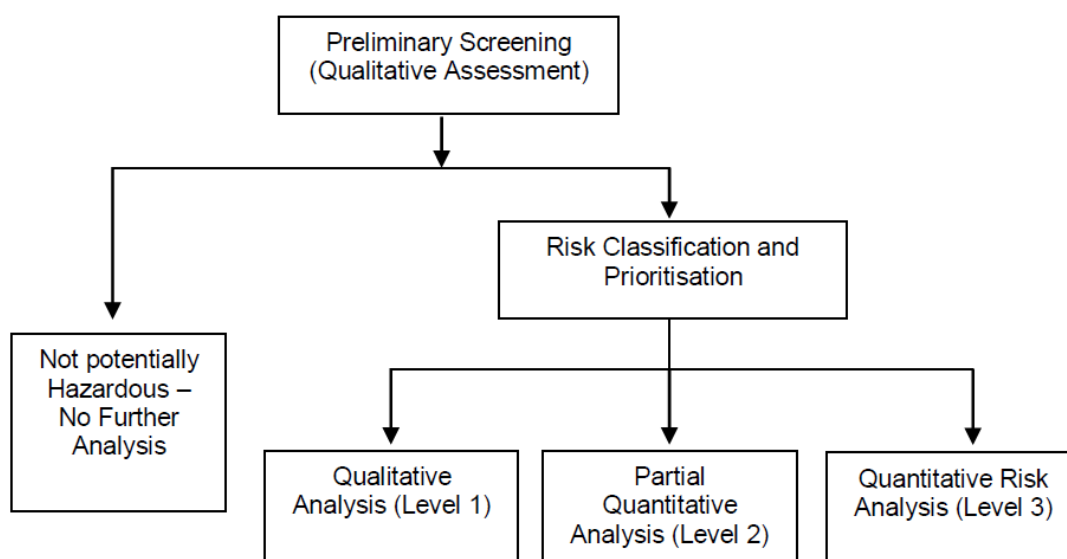
The Multi-Level Risk assessment approach, published by the DPIE has been utilised to determine the level of risk. The Multi-Level Risk Assessment Guidelines are intended to assist industry, consultants, and consent authorities to carry out and evaluate risk assessments at an appropriate level for the facility being studied.

There are three levels of risk assessment set out in the Multi-Level Risk assessment appropriate for a PHA, as outlined below:

Figure 15 Level of Assessment PHA

Level	Type of Analysis	Appropriate If:
1	Qualitative	No major off-site consequences and societal risk is negligible
2	Partially Quantitative	Off-site consequences but with low frequency of occurrence
3	Quantitative	Where 1 and 2 are exceeded

The Multi-Level Risk Assessment approach is schematically presented in **Figure 2-1**.



Source: Riskcon, 2021

Based on the above, Riskcon have identified a Level 2 Assessment as the most appropriate for the site. This approach provides a qualitative assessment of those DGs of lesser quantities and hazard, and a quantitative approach for the more hazardous materials to be used on-site.

When undertaking the assessment, the following DG's were identified as stored in site.

Figure 16 Quantities of DGs Stored & Handled

Class	PG	Description	Quantity (L)	Storage
2.1	n/a	Flammable gases – LPG	3,920	Bulk Tank
3	II	Flammable Liquids	10,000	Flammable dispensary
	III		60,000	
4.1	II	Flammable Solid	1,000	
	III		1,000	
5.1	II	Oxidising Agents	44,000	Liquid Storage Shed
	II		1,000	DAF
6.1	II	Toxic Substances	5,000	Liquid Storage Shed
8	II	Corrosive Substances – Acids and Bases	60,000	Tank Farm
	III		100,000	
8	II	Corrosive Substances	25,000	Liquid Storage Shed
	III		30,000	
8	II	Corrosive Substance	1,000	DAF
9	III	Environmentally Hazardous Substances	150,000	Liquid Storage Shed
9	III	Miscellaneous DG	30,000	Tank Farm
C1	n/a	Combustible Liquid	50,000	Flammable dispensary
C2	n/a		30,000	Flammable dispensary

Source: Riskcon, 2021

Where more than one class of DGs are stored and handled on site, an aggregate quantity ratio (**AQR**) exists.

Where the ratio AQR exceeds a value of 1, the site would be considered a Major Hazard Facility (**MHF**). The threshold quantities for each class are taken from the NSW Work Health & Safety Regulation. These are summarised below in **Table 23**, noting that Class 4.1(III), 8 and 9 are not subject to MHF legislation.

Table 23 Major Hazard Facility Thresholds

Class	Packing Group	Description	Threshold (tons)	Storage (tons)
2.1	n/a	LPG	200	2
3	II & III	Flammable liquids	50,000	70
5.1	II	Oxidizing materials	200	45
6.1	II	Toxic substances	200	5

Source: Riskcon, 2021

A review of the thresholds, commodities and packing groups listed in **Table 23** indicates that only Class 2.1, Class 3, Class 5.1, and Class 6.1 are assessable against the MHF thresholds. Riskcon notes that as the AQR equates to 0.262, or less than 1, the facility would thereby not be classified as an MHF.

[illegible]

Noting the above, Riskcon have undertaken a hazard identification that has been developed following the recommended approach in Hazardous Industry Planning Advisory Paper No .6, Hazard Analysis Guidelines (Ref. [3]). The Hazard Identification Table provides a summary of the potential hazards, consequences, and safeguards at the site. The table has been used to identify the hazards for further assessment detailed below.

Table 24 Hazard Identification Table

ID	Area/Operation	Hazard Cause	Hazard Consequence	Safeguards
1	Package store (Class 5.1, 6.1, 8 & 9)	<ul style="list-style-type: none"> <li>Dislodgement from racking</li> <li>Forklift misalignment, resulting in puncture of package.</li> <li>Package dropped from forklift</li> </ul>	<ul style="list-style-type: none"> <li>Potential environmental release</li> <li>Mix of incompatible goods (exothermic reaction)</li> </ul>	<ul style="list-style-type: none"> <li>Bunding, complying with AS3780-2008</li> <li>Separate compounds for acids and bases</li> <li>Operators are trained to safely operate forklifts</li> <li>Racking is provided by a reputable supplier</li> <li>Site stormwater containment</li> </ul>
2	Flammable liquids store (Class 3)	<ul style="list-style-type: none"> <li>Dislodgement from racking</li> <li>Forklift misalignment, resulting in puncture of package.</li> <li>Package dropped from forklift</li> </ul>	<ul style="list-style-type: none"> <li>Potential environmental release</li> </ul>	<ul style="list-style-type: none"> <li>Bunding, complying with AS 1940-2017</li> <li>Operators are trained to safely operate forklifts</li> <li>Racking is provided by a reputable supplier</li> <li>Site stormwater containment</li> </ul>
			<ul style="list-style-type: none"> <li>Pool of flammable liquid, immediate ignition and fire.</li> <li>Delayed ignition of flammable liquid and flash fire or explosion.</li> </ul>	<ul style="list-style-type: none"> <li>Ventilation complying with AS 1940-2017</li> <li>Sprinkler protection</li> <li>Fire walls with FRL 240/240/240</li> <li>HAC, per AS/NZS 60079.10.1:2009</li> <li>Electrical equipment complying with AS/NZS 60079.14:2017</li> <li>Operators are trained to safely operate forklifts</li> <li>Racking is provided by a reputable supplier</li> <li>No smoking policy on site</li> </ul>

ID	Area/Operation	Hazard Cause	Hazard Consequence	Safeguards
				<ul style="list-style-type: none"> <li>▪ Ignition source control placarding, complying with AS 1940-2017</li> <li>▪ First attack firefighting equipment (hose reels and extinguishers), and hydrants.</li> </ul>
3	Bulk Acids and Bases Tanks (Class 8)	<ul style="list-style-type: none"> <li>▪ Tank leak (leaks from valves, fittings or pipework)</li> <li>▪ Overfilling of tank</li> <li>▪ Potential impact from forklift, resulting in release</li> <li>▪ Operator error (mixing of incompatible goods)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Environmental release</li> <li>▪ Mixing of incompatible goods (exothermic reaction)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Site stormwater containment</li> <li>▪ Bunding, complying with AS3780-2008</li> <li>▪ Separate compounds for acids and bases</li> <li>▪ Barriers between acids and bases</li> <li>▪ Operators are trained to safely operate forklifts</li> <li>▪ Unique connection configuration for acids and bases</li> <li>▪ Overfill protection (high level sensors and alarms)</li> </ul>
4	DAF	<ul style="list-style-type: none"> <li>▪ Punctured or deteriorated IBC</li> <li>▪ Leak from dosing equipment</li> </ul>	<ul style="list-style-type: none"> <li>▪ Environmental release</li> <li>▪ Mixing of incompatible goods (exothermic reaction)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Natural ventilation</li> <li>▪ Bunding complying with AS 3780-2008</li> <li>▪ Site wide containment</li> </ul>
5	LPG Tank	<ul style="list-style-type: none"> <li>▪ Release of LPG from tank filling or cylinder filling</li> <li>▪ Tank leak (valves and fittings)</li> <li>▪ Vehicle collision and tank puncture</li> </ul>	<ul style="list-style-type: none"> <li>▪ Formation of a vapour cloud, delayed ignition and explosion</li> <li>▪ Immediate ignition resulting in jet fire</li> <li>▪ Jet fire impingement on tank shell resulting in BLEVE</li> </ul>	<ul style="list-style-type: none"> <li>▪ Natural ventilation</li> <li>▪ System designed in accordance with AS/NZS 1596:2014</li> <li>▪ ARMCO barriers to protect from impact</li> <li>▪ Operator can stop source of release (emergency stop during filling)</li> </ul>

ID	Area/Operation	Hazard Cause	Hazard Consequence	Safeguards
		<ul style="list-style-type: none"> <li>Over-pressurisation and pressure relief activation</li> </ul>	<ul style="list-style-type: none"> <li>Jet fire impingement on delivery tank resulting in BLEVE</li> </ul>	<ul style="list-style-type: none"> <li>Operators trained in first attack firefighting</li> <li>Operators are trained to safely operate forklifts</li> <li>Separation distances complying with AS/NZS 1596:2014</li> <li>First attack firefighting equipment available (fire extinguishers and hose reels)</li> <li>Hydrant protection</li> <li>HAC, per AS/NZS 60079.10.1:2009</li> <li>Electrical equipment complying with AS/NZS 60079.14:2017</li> <li>No smoking policy on site</li> <li>Ignition source control placarding, complying with AS/NZS 1596:2014</li> <li>Fire and Rescue may respond faster than BLEVE escalation</li> </ul>
6	General Warehouse	<ul style="list-style-type: none"> <li>Sprinkler water not contaminated</li> </ul>	<ul style="list-style-type: none"> <li>Environmental contamination</li> </ul>	<ul style="list-style-type: none"> <li>Site wide containment complying with the Best Practice Guidelines for Contaminated Water &amp; Retention Systems (Ref.[13]).</li> </ul>

Source: Riskcon, 2021



Based on the above table, Riskcon identified the most likely potential hazards that may present at the site due to the operational parameters and storage of chemicals are the following:

- Fire impacts;
- Explosion;
- Toxicity;
- Property damage and accident propagation; and
- Social risk.

The frequency analysis and risk assessment undertaken by Riskcon in **Appendix M** identifies that the incidents carried forward would have a fatality risk of 0.0012 chances per million per year (**pmpy**) at the site boundary, with lesser risk at further distances from the boundary. HIPAP No. 4 (Ref. [2]) publishes acceptable risk criteria at the site boundary of 50 pmpy (for industrial sites). Therefore, the probability of a fatality at the site boundary is within the acceptable risk criteria.

In addition, incidents exceeding 23 kW/m<sup>2</sup> were reviewed which indicated that the contours from such incidents would not impact any structures and thus propagation incidents would be not expected to occur based upon the analysis.

Based on the analysis conducted, it is concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

#### **6.1.4.3. Mitigation Measures**

Despite the site and proposal ultimately being considered only potentially hazardous and overall suitable for the site, the following mitigation measures have been proposed by Riskcon:

- The warehouse and/ or site boundaries are capable of containing 702m<sup>3</sup> of water storage required to meet the needed 7.8m<sup>3</sup>/min of discharge for the warehouse fire, sprinkler activation and contaminated water release.
- A storm water isolation point (i.e. penstock isolation valve) is to be incorporated into the design. The penstock shall automatically isolate the storm water system upon detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course.

### **6.1.5. Soil & Water**

#### **6.1.5.1. Existing Environment**

The site has historically been utilised for extractive industry to enable the manufacturing of bricks, which resulted in extensive exaction, reportedly to be up to 35m deep. In accordance with the SSD-10436 and its associated MOD 1 the appropriate consideration to impacts to soil and water was undertaken and subsequently, approval was acquired for all the hardstand, building, and stormwater management measures required for operation of the site.

Of note, this includes existing Sydney Water mains supply, rain and stormwater harvesting scheme, and the appropriate stormwater management measures including OSD systems, on-lot treatment measures (including proprietary filters and pit inserts, bioretention basins). No further changes are proposed to the approved building or stormwater management works than those previously approved.

#### **6.1.5.2. Potential Impacts**

A Contaminated Water Retention Report was prepared by Moore Management in 2019 (**Appendix P**) to identify the water retention and potential quality management impacts that were established in the Jalco operations at Smithfield. It is noted that the operations and subsequent potential water impacts and mitigation strategies at the subject site will be consistent with those established at the Smithfield site.

It is to be noted that whilst Jalco are committed to providing a relevant Contaminated Water Retention Report for the proposed site at the HLP once readily available, it is at this point in time unavailable as these reports are prepared by Sydney Water as part of the operational environmental monitoring of Jalco (and other similar operators) and as required under their existing Environmental Protection License. Sydney Water regularly monitors Jalco's existing facility for foreign bodies being discharged into the Sydney Water

system. Using this data, Sydney Water then determines whether any fines will be applied to the operator as a result. The Smithfield report is provided as an example of the expected level of water quality to be generated from the proposed operation. There is however no such Contaminated Water Retention report available for the proposed HLP site as the report can only be prepared once the facility is operational. Such a report will be a requirement of the EPL for Jalco on the subject land and similar to Smithfield will form part of the ongoing operational environmental monitoring process.

With regard to the operation of the proposed facility, it is identified that the relevant water sources at the Jalco site is towns water and rainwater which will be used for general amenities (e.g. toilets, drinking water, landscaping) as well as specific production which include the following:

- Water to be mixed into the manufactured product;
- Water used for vessel and pipe cleaning;
- Water used for cleaning production areas;
- Boiler blowdown; and
- Water used in the regeneration of the deionised water vessels.

The water used in production will be removed from the site either as part of the manufactured products themselves or through a waste-water treatment plant. Considering the water used for cleaning and management of the internal tenancy, it is anticipated that tens of thousands of litres of water will flow through the site in support of its operations. Wastewater generated during operations will be stored and treated onsite using a series of storage and balance tanks along with a Dissolved Air Flotation (**DAF**) unit. These operations will be located in the northwest corner of the site.

The DAF process treats wastewaters via the removal of suspended matter such as oils and solids. The filtration is achieved by dissolving air in the water/wastewater under pressure and then releasing the air at atmospheric pressure in a flotation tank basin. The released air forms tiny bubbles which hold to the suspended matter causing the suspended matter to float to the surface of the water where it may then be removed.

Accordingly, considering the substantial quantity of water travelling through the site, the relevant management procedures will be implemented to ensure there are no adverse water quality/quantity impacts from the site generated by the water disposal as well as potential water over-use and spillage.

As noted above, at this the stage of the development is it impossible to provide accurate water usage and water waste to be generated at the proposed facility, as production process will be different to what is currently undertaken at the existing Smithfield facility today.

The proposed facility at the HLP will require more water as a result of containing the following:

- Three new high speed filling lines – operating at 100 bottles a minute (which will have 60-80 v/v of water based on the SKU's run),
- Transfer of 6 existing lines from Smithfield and integrating other site (approx. 3 filling line) which will do 40 bottles a minute (which will have 60-80 v/v of water based on the SKU's run).
- The expected business improvement will be around 1.3% of our current Smithfield business.
- Some tanks and associated pipework will be heat traced as part of the project – which will increase the usage of hot water. Given the length of pipes, it is assumed that there will be significantly more water usage at the proposed site rather than Smithfield.

Noting this Jalco intends to utilise the available Smithfield data to highlight the processes and data that will be made available. It is the intention of Jalco, like the existing Smithfield facility, to regularly submit a Contaminated Water Retention Report as part of their EPL and ensure the highest of operational standards and best industry practice is undertaken during the operation of the facility.

#### **6.1.5.3. Mitigation Measures**

The appropriate disposal, over-use mitigation and spill management procedures are expected to be conducted through the following to ensure no adverse water quantity/quality impacts:

- **Fixed Purge Amounts:** requirement to purge and clean vessels and lines to be managed in standardised amounts. Flow metering and automatic valves allows fixed volumes.
- **Re-use of Cleaning Water:** The initial fluid following cleaning and purging of pipelines and vessels is heavily contaminated, but as the purging and cleaning proceeds, the level of contamination decreases. This counter-current use of cleaning fluid can result in a reduction in water used and trade waste generated.
- **Trade Waste Flow-Rate:** the relevant storage and DAF unit will manage treatment of wastewater and its operation will be conducted on a shift basis (to be operated over 7 days a week as per the daily operation of the facility). It will be ensured that the wastewater plant throughput is not maximised and the appropriate buffer storage is available to handle peak flows.
- **Wastewater Treatment:** the wastewater treatment will be undertaken to ensure the quality of the trade waste meets the requirements of Sydney Water discharge parameters.
- **Rainwater Effect Management:** Rainwater is collected throughout the site and will be appropriately reused once contaminants have been appropriately reduced. Otherwise, the cumulative trade waste and rainwater flow will be appropriately managed.
- **Contaminated Water Retention:** as to minimise the impacts of contaminated water retention, the following procedures will be used:
  - **Secondary Containment:** containment bunds, encasement and grading of the surrounding surfaces of containment areas will prevent any impacts of potential spilling. The relevant standards will be applied for hazardous materials storage.
  - **First Flush:** first flush systems can be used to prevent pollutants that have accumulated on outdoor surfaces from entering the stormwater system during rain events.
- **Outside Storage of Liquid Hazardous Chemicals:** with consideration of the liquid storage shed, it is noted that the appropriate fire protection standards will be integrated to ensure a potential fire event will not cause significant spillage of hazardous liquid chemicals from outdoor storage. The appropriate site containment (e.g. bunds), fire-fighting infrastructure and management of hazardous liquid chemical quantities can be undertaken.

Accordingly, through the establishment water management procedures adopted in other Jalco sites, the proposed industrial change of use and fit-out can be appropriately accommodated without any substantial, adverse impacts to the water quality and quantity in the area. It is noted that the Jalco operations includes the usage and retention of substantial quantities of potentially contaminated water, however the strategies identified above will ensure that the appropriate management of water flows and containment of contaminated liquids for suitable disposal off site.

## 6.1.6. Air Quality

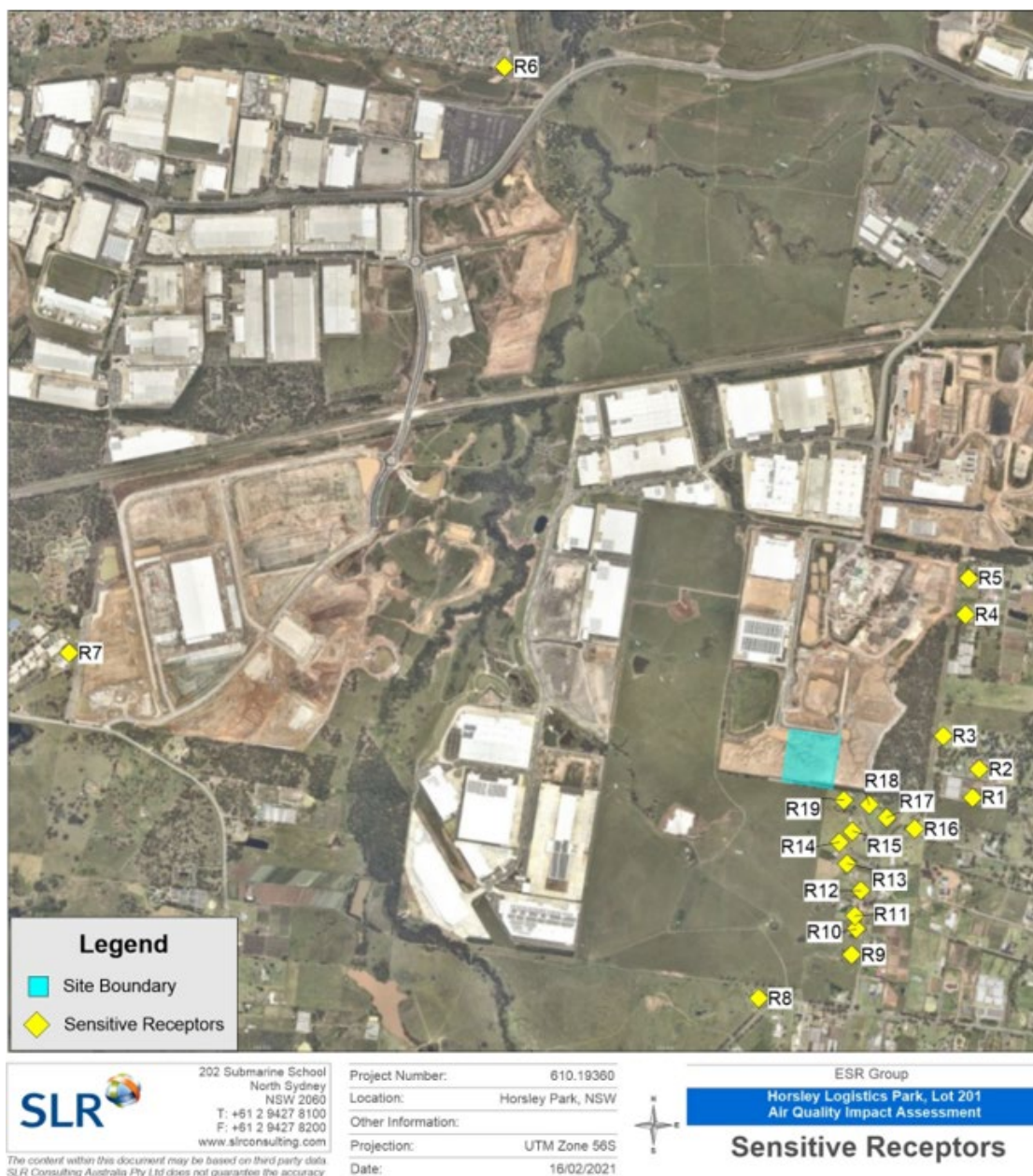
An Air Quality Impact Assessment (AQIA) has been prepared by SLR in accordance with the NSW EPA document '*Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*', hereafter referred to as 'The Approved Methods'. The AQIA is included at **Appendix F**. The assessment methodology includes the modelling of local meteorology and the dispersion of potential emissions from the proposed operations to predict potential air quality impacts on surrounding environment.

### 6.1.6.1. Existing Environment

The Site is located in a semi-rural environment surrounded by low density residential areas and industrial areas. **Figure 18** illustrates the location of these surrounding receptors relative to the Project location.

It is noted that the Project site and neighbouring area are located within the 20 and 25 Australian Noise Exposure Concept Contour as per the *State Environmental Planning Policy, Western Sydney Aerotropolis* which requires that no further sensitive development (including residences) can be located within this area. Thus, only existing sensitive receptors have been assessed as part of this study.

Figure 18 Locations of Sensitive Receptors



Source: SLR

The topography of the local area ranges from approximately 0 m to 360 m Australian Height Datum (AHD). The Site is located on slightly elevated terrain, with potential for light air drainage flows from higher to lower elevations, under calm conditions.

The key climate characteristics of the locality are as follows:

- Mean maximum temperatures range from 17.4°C in winter to 30.1°C in summer, while mean minimum temperatures range from 5.8°C in winter to 18°C in summer. Maximum temperatures above 45°C and minimum temperatures less than 0°C have been recorded.
- Rainfall is relatively high in summer, reducing over autumn into winter, with the lowest average of 37.1 mm recorded during September. Peak rainfall events occur during summer, with the highest rainfall in February.
- Winds from the southwest are predominant in the morning while winds from the southeast are predominant during the afternoon.

- mean daily solar exposure levels are highest in summer and lower in winter
- Morning humidity levels range from an average of around 61% in early winter to around 81% in early autumn. Afternoon humidity levels are lower, at around 55% in winter and 42% in spring.

Key nearby odour sources within a 2km radius of the site are

- PGH Bricks and Pavers Horsley Park, approximately 1.4 km north; and
- George Borg Piggery Horsley Park, approximately 1.8 km northeast;

Both these operations are unlikely to emit odours that would have similar characteristics of that to be emitted from the proposed operations.

SLR observed that background odour levels at the site and surrounding areas are considered to be negligible.

### 6.1.6.2. Potential Impacts

SLR conducted odour emission monitoring at Jalco's existing Smithfield operations at 277-303 Woodpark Rd, Smithfield. These operations include powder and liquid detergent manufacturing and warehousing facility and have a comparable throughput of 4000 tpa.

It is noted that odour concentrations monitored at the Smithfield facility are likely to be a conservative representation of anticipated emission at the Site as the proposed operations will employ advanced technologies and will be predominantly automated.

Conservative odour concentrations and odour emission rates (OER) have been estimated for each of the identified potential sources, which are presented in **Figure 19**.

Figure 19 Measured and Estimated Odour Emission Parameters

Odour Emission Source	Measured at Smithfield Facility		Estimated at Proposed Facility		
	Odour Concentration (ou)	Flow Rate (m <sup>3</sup> /s)	Odour Concentration (ou)	Flow Rate (m <sup>3</sup> /s)	OER (ou.m <sup>3</sup> /s)
<b>Scrubber Stacks</b>					
Scrubber Stack (HSFL)	-	-	38	2.6	98
Scrubber Stack (LSFL)	200	0.3	38	1.5	59
Scrubber Stack (BFL)	83	0.5	83	0.5	37
Scrubber Stack (Blending tanks)	180	0.2	180	0.8	145
<b>Wastewater Treatment Facility</b>					
WWST	25,000	0.01	25,000	0.01	250
Balance Tank	-	-	25,000	0.01	250
DAF Unit	-	-	25,000	0.01	250
<b>Fugitive Emissions</b>					
Vertical vents	59	23.3	59	5.0	1,239
RSD	-	-	-	-	138

Source: SLR

Estimated odour emission rates and other relevant parameters utilised in the dispersion modelling are presented in **Figure 20**.

Figure 20 Estimated Odour Emission Rates

Odour-Emission-Source	Source-type	Height-Above-Ground-(m)	Diameter-(m)	Exit-Velocity-(m/s)	Area-(m <sup>2</sup> )	Temperature	OER-(ou.m <sup>3</sup> /s)
<b>Scrubber-Stacks</b>							
Scrubber-Stack-(HSFL)	Point	16	0.5	13.0	-	Ambient	98
Scrubber-Stack-(LSFL)	Point	16	0.375	13.9	-	Ambient	59
Scrubber-Stack-(BFL)	Point	16	0.375	4.1	-	Ambient	37
Scrubber-Stack-(Blending-tanks)	Point	16	0.375	7.3	-	Ambient	145
<b>Wastewater-Treatment-Facility</b>							
WWST	Area	2	-	-	16.6	-	15.04-(ou.m <sup>3</sup> /m <sup>2</sup> /s)
Balance-Tank	Area	2	-	-	15	-	15.04-(ou.m <sup>3</sup> /m <sup>2</sup> /s)
DAF-Unit	Area	1	-	-	12	-	15.04-(ou.m <sup>3</sup> /m <sup>2</sup> /s)
<b>Fugitive-Emissions</b>							
Vertical-vents-(5)	Point	15.7	0.86	2	-	Ambient	248
RSDs-(4)	Volume	0	-	-	-	-	34

Source: SLR

Emissions from the proposed operations have been modelled using a combination of the TAPM, CALMET and CALPUFF models. This methodology had regard to

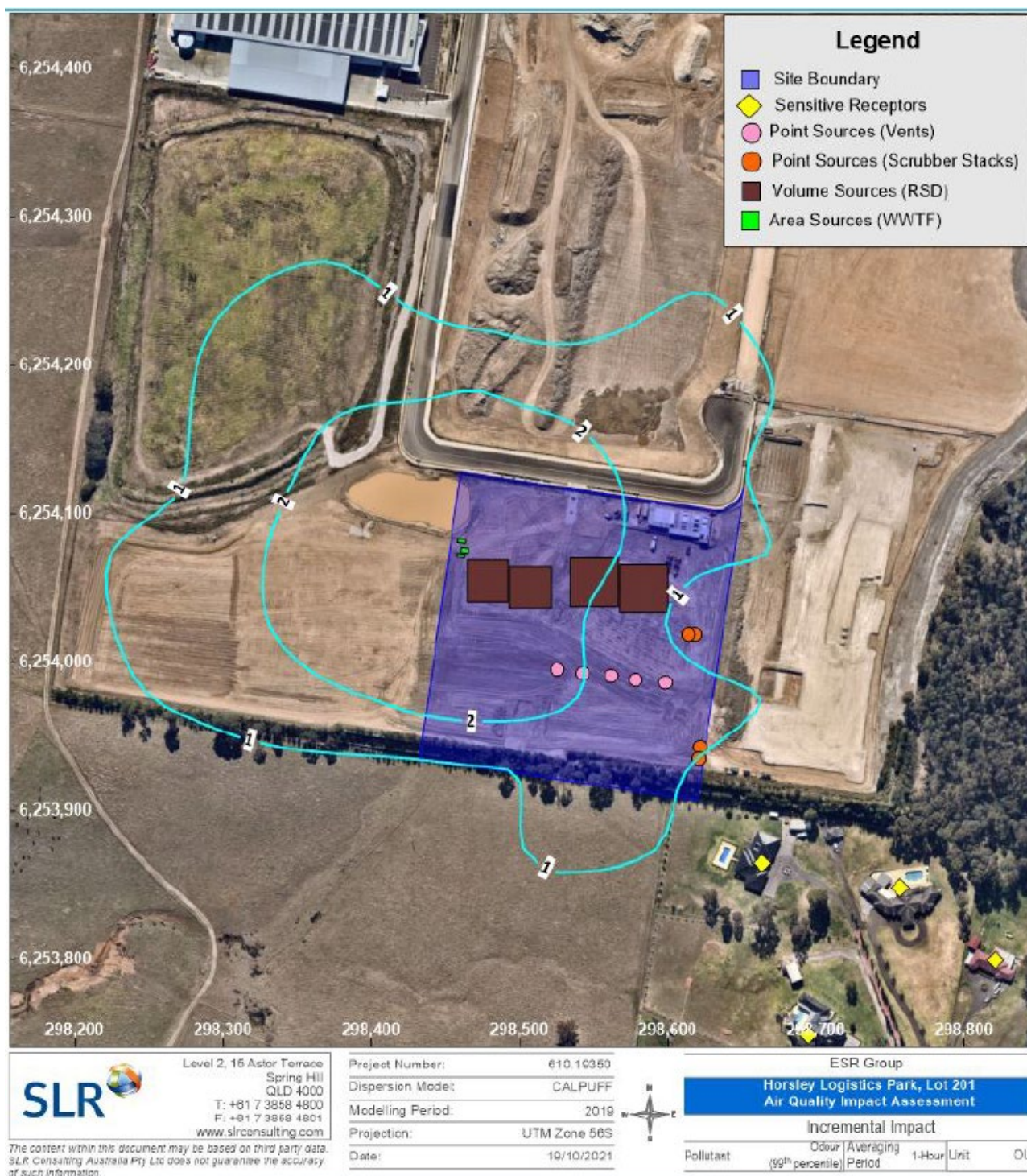
- Anticipated odour emission rates,
- Wind speed and direction,
- Atmospheric stability, and
- Mixing heights.

Analysis of the odour dispersion modelling found that the odour concentrations predicted at the surrounding sensitive receptors are well below the relevant odour criterion of 2 ou with the nearest sensitive receptor predicted to experience a maximum odour concentration of 0.6 ou (99<sup>th</sup> percentile, nose response averaging period). A contour plot presenting the isopleth of predicted odour concentrations across the modelling domain is presented in **Figure 21**.

Based on the results of the modelling, it is concluded that proposed operation is unlikely to cause any significant odour nuisance at any surrounding sensitive receptors.



Figure 21 Odour Impacts



Source: SLR

SLR notes that the proposed installation of acoustic barriers around roof plant proposed under SSD-10436 MOD 2 will reduce the odour impacts presented in their assessment. Those acoustic barriers are yet to be approved via SSD-10436 MOD2.

### 6.1.6.3. Mitigation Measures

The predicted 99<sup>th</sup> percentile odour concentrations at all nearby sensitive receptors are predicted to be well below the adopted odour impact criterion of 2 ou (nose response time). Nevertheless, additional management measures could be applied to the proposed operations with the aim of reducing the potential for air and odour emissions, increasing the atmospheric dispersion of air emissions, or a combination of both. The following mitigation measures may be considered:

- Ensure all equipment are maintained in good condition and serviced as per manufacturer's recommendations.
- Inspect the site daily and apply good housekeeping in general. General measures will include ensuring the timely clean-up of any spills as well as identifying and rectifying any leaks that could contribute to fugitive emissions.
- Any modifications to the proposed design should consider positioning emission sources as far as practicable from neighbouring receptors.
- Manage vehicle emissions by minimising idling times and installing signage to instruct drivers to turn off engines while loading/unloading etc.

In addition to the above, complaints monitoring could be a very useful tool in assessing whether nuisance is being caused. It is therefore recommended that any complaint should be investigated as soon as possible so that effective appraisal of the complaint can be carried out by subjective assessment. Where odour complaints are verified, engineering, operational or other odour reduction measures may be implemented.

Based on the findings of the AQIA, it is concluded that the proposed operations are unlikely to cause any adverse impacts at the surrounding sensitive receptors and would comply with the relevant ambient air quality and odour guidelines.

## 6.2. STANDARD ASSESSMENT IMPACTS

This section of the report addresses the matters which require a standard assessment. It outlines the findings of the assessment and the key mitigation measures used to ensure compliance with the relevant standards or performance measures.

### 6.2.1. Land Contamination

Various consents have been issued as detailed in **Section 1.4** for site remediation, being the responsibility of the former land owner CSR. The required site remediation works have been undertaken on the site, which was a precondition to the sale of the land from CSR to ESR Australia, which was completed by 2021 as per the subdivision certificate.

The proposed Jalco use and fit-out is proposed within a building that has been approved by SSD-10436 for warehouse and distribution purposes. The change of land use from warehouse to general industrial raises no further issues of contamination risk.

In addition, the proposal does not involve the removal of soil or undertaking of ground works. The proposal constitutes fit-out and use of an approved building only.

As such, the land is considered to be suitable for the proposed use.

### 6.2.2. Bushfire

Given the Jalco proposal intends to remain within the Warehouse 1 building footprint as approved under SSD-10435 and MOD 1, it is intended that the previous Bushfire Protection Assessment prepared by Eco Logical Australia (**Appendix T**) and submitted for lodgement with SSD-10436 is able to be relied upon within this application.

As noted within the report prepared by Eco Logical Australia, the predominant vegetation formation was assessed for a distance of at least 140m from the HLP site in all directions. This was determined from the Native vegetation of the Cumberland Plain, Western Sydney vegetation maps (OEH, 2013) and NearMap Imagery captured January 2020.

The slope that would most significantly influence fire behaviour was determined over a distance of 100m from the boundary of the proposed development under the classified vegetation. The effective slope has been determined from 2m contour data and revised where required by site assessment.

Bushfire prone vegetation affecting the proposed development includes the following:

- To the south and west of the site is a grassland hazard is present. This grassland is on a slope categorised as '>0-5 degrees downslope';



- To the east, beyond the managed environmental conservation area, woodland vegetation is present within the environmental conservation and has a slope categorised as '>0-5 degrees downslope'; and
- To the north, there are managed lands that have been cleared for future industrial and residential development and road reserves associated with the existing subdivision construction.

Based on the abovementioned assessment the Bushfire Attack Level (**BAL**) the proposal is exposed to is a maximum of BAL-29. **Table 25** below details the bushfire hazard assessment, Asset Protection Zones (**APZ**) requirements and BALs.

Table 25 Bushfire Hazard Assessment

<b>Transect #</b>	<b>Slope</b>	<b>Vegetation Formation</b>	<b>Required APZ</b>	<b>Proposed APZ</b>	<b>PBP 2019 BAL</b>
1	> 0° to 5° downslope	Woodland	16-m	>16-m	BAL-29: 16 to <23 m BAL-19: 23 to <32 m BAL-12.5: 32 to 100 m BAL-LOW: >100 m
2	> 0° to 5° downslope	Grassland	12-m	>12-m	BAL-29: 12 to <17 m BAL-19: 17 to <25 m BAL-12.5: 25 to 50 m BAL-LOW: >50 m
3	> 0° to 5° downslope	Grassland	12-m	>12-m	BAL-29: 12 to <17 m BAL-19: 17 to <25 m BAL-12.5: 25 to 50 m BAL-LOW: >50 m

Source: Eco Logical Australia, 2020

The Transect 2 APZ is applicable to Lot 201 and is ultimately protected by the landscape buffer adjacent to Lot 201. Similarly, transect 3 is applicable to Lot 201 and is further protected by the approved parking space for Lot 201.

Given the proposal intends to operate within the existing building footprint as approved under SSD-10436 and subsequently MOD 1, the proposal remains compliant within all bushfire requirement and is ultimately not to be impacted by threat of bushfire.

The proposed mitigation measures provided by Eco Logical Australia, and as endorsed by the DPIE and the RFS in the approval of SSD-10436, are intended to be adopted by both ESR, the HLP site owners, and Jalco, the future tenant of Warehouse 1.

### 6.2.3. Waste Management

SLR Consulting were engaged to prepare a Waste Management Plan (**WMP**) to assess the quantities and classification of waste that would be generated as a result of the proposed development. The WMP applies to the waste generated from site fit-out and operational stages of the project.

The WMP details the way in which the waste would be stored, handled, and disposed and the measures to be implemented to ensure the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021*. A copy of the WMP is attached at **Appendix O**.

The WMP has been prepared in consideration on the following:

- SEARs issued by the DPIE;
- Fairfield Citywide Development Control Plan 2013;
- NSW EPA's Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities 2012;
- NSW Waste and Sustainable Materials Strategy 2041: Stage 1 – 2021-2027;
- NSW EPA (2014) NSW Waste Avoidance and Resource Recovery Strategy 2014-21;
- *Waste Avoidance and Resource Recovery Act 2001*; and
- Design documentation for the development, including specialist technical reports.

### 6.2.3.1. Fit-Out Waste Management

Given the proposal intends to occupy a vacant warehouse space, no assessment of the waste streams and management associated with the fit-out of machinery has been undertaken by SLR. The fit-out of Warehouse 1 will be limited to the instillation of pre-constructed machinery and is not expected to generate waste streams that are required to be managed under the *NSW Waste Avoidance and Resource Recovery Strategy 2014-2021*.

### 6.2.3.2. Operational Waste Management

SLR have identified the majority of waste streams from the proposals operation as being general office waste and bulk packaging associated with the packaging aspect of the facilities operation. Whilst there are a number of DG chemicals utilised in the manufacturing facility, they are not at risk of being a source of waste for the facility.

The estimated quantities of operational waste generated by the proposal are shown in the table below:

Table 26 Estimated Quantities of Operational Waste

Estimated quantities	Recyclables (L/day)						General Waste (L/day)		Other (L/day)	
	Cardboard	Plastics	Bulker bag	Empty containers	Other recyclables	Metal	Wooden pallets	Other	Liquid <sup>1</sup>	DAF plant waste
Uncompacted	8,877	14,000	32,800	8,088	200	110	13,636	18,004	27	219
compacted	2,219	3,500	8,200	-	-	-	-	-	-	-

1. Non-hazardous liquid that cannot be discharged to sewer

To minimise packaging waste in the recyclable stream, it has been recommended that package waste is returned to suppliers where possible. Standard pallets are recommended to be returned to their owners, and additional collection services such as secured document destruction is to be organised by a private waste contractor who can provide additional bins to collect and be taken to an off-site licensed facility.

The identified waste storage and collection of waste and recycling is to be undertaken as per the existing WMP for Jalco Powders Pty Ltd. The proposed waste storage system is based on the existing waste generation quantities at the existing Jalco Smithfield facility. The existing waste storage system, including collection frequencies, currently operated by Jalco and to be applied in Warehouse 1, is shown below in **Table 27**.

Table 27 Recommended Storage Ware for Weekly Operations

Waste Stream		Collection Per Week	Storage System
Recyclables	Cardboard	2	1 x compactor 9 x 1 m <sup>3</sup> bins
	Plastics	5	4 balers
	Ulcer bag	2	1 screw compactor
	Empty containers	2	Staging area only IBC and drums stored in designated racking
	Other recyclables	1	1 x 1 m <sup>3</sup> bins
General waste	Wooden pallets	2	Staging area
	Other general waste	5	11 x 1.5 m <sup>3</sup> bin
Metal	Metal	As needed	1 x 10 m <sup>3</sup> bin
Liquid	Liquid	As needed	1000 L tank
DAF plant solid waste	DAF plant solid waste	As needed	40,000 L tank

SLR have recommended that, similar to the existing Smithfield facility, the location of waste and recycling storage area is to be incorporated into the existing footprint of the development. Jalco are committed to ensuring best practice in relation to waste management and similar to their existing operation will comply with the industry standard of storing all waste and recyclables on site in a location that is easily accessible for their contracted waste collectors.

Further details of the requirements for the waste storage area as well as the individuals responsible for the success of the WMP being implemented are provided in **Appendix O**. The detail will inform the location and specifications for a dedicated waste storage area within the Jalco tenancy, to be detailed for Construction Certificate stage. Additional waste management measures, including waste servicing, waste avoidance, re-use and recycling, communication strategies, signage, monitoring, and reporting are discussed in the WMP and should be implemented in the operational phase of the development.

## 6.2.4. Ecologically Sustainable Development

The *Environmental Planning and Assessment Regulation 2000* (clause 7(4) of Schedule 2) defines the Principles of Ecologically Sustainable Development (ESD). The response to the Principles of ESD in accordance with EPA regulation is addressed below:

### Precautionary Principle

The precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation.

This EIS has not identified any serious threats of environmental damage that cannot be adequately mitigated or addressed based on current scientific standards and best practices. In this regard, the proposed development can be considered generally consistent with the precautionary principle.

## Inter-Generational Equity

Intergenerational equity ensures the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations.

The proposed development is intended to benefit both the current and future generations and incorporates adequate environmental protection and impact mitigation measures to ensure environmental values are maintained and improved as a result of the development.

## Conservation of Biological Diversity and Ecological Integrity

The Planning Secretary of the Department of Planning, Industry and Environment and the Chief Executive of the Environment, Energy and Science Group of the Department have determined that the proposed development is not likely to have any significant impact on biodiversity values. A BDAR waiver has been issued in this regard.

## Improved Valuation, Pricing, and Incentive Mechanisms

This requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation.

The proposal has considered the environmental values of the site and the likely impacts of the development, particularly during operational activities. Mitigation measures to address ESD impacts include

- Water management - in accordance with the existing procedures established in existing Jalco sites, the appropriate water flow management will be established for the relevant cleaning, waste-water treatment and rainwater flow. Additionally, the appropriate containment measures will be established for the hazardous water containment.
- Achievement of BCA Section J Energy Efficiency for the base building, as approved under SSD-10436.
- Requirement to ensure additional fit-out works for the proposed Jalco operation, including air conditioning, light & power, hot water supply achieve the requirements of BCA Section J.

## 6.2.5. Greenhouse Gas & Energy Efficiency

Resource efficiency is a consideration at every stage of the industrial development process. The principles of sustainable design have been incorporated into the proposal through careful consideration of passive building design measures and building material selection for the base building approved by SSD-10436.

Section J of the BCA establishes the minimum requirements for energy efficiency in buildings in respect of the Proposal and the BCA Report lodged as **Appendix G** concludes that the proposal can comply with the deemed-to-satisfy provisions of the BCA. The BCA Report commits to adherence to the sustainable design principles that was ultimately approved under SSD-10436 for Warehouse 1, these include:

- Building fabric;
- Building sealing;
- Air conditioning and ventilation systems;
- Artificial light and power; and
- Hot water supply.

As it related to this Jalco proposal the BCA report requires the additional fit-out works for the proposed Jalco operation, including air conditioning, light & power, hot water supply that are not covered by SSD-10436 achieve the requirements of BCA Section J.

It is recommended that the building be verified against a reference building using the Verification Method JV3. This will determine if the proposed development and its services has an equal or less annual energy consumption of the reference building. Compliance and how it is achieved should be documented in a report by an appropriately qualified engineer for certification.

## **6.3. CUMULATIVE IMPACT ASSESSMENT**

It is acknowledged that the proposed operations generated by the proposed industrial change of use and fit-out may have short term and long term cumulative environmental impacts with consideration for the existing and intended industrial/warehouse uses across the HLP and the surrounding CSR estate lands. Accordingly the relevant environmental impact assessments and studies prepared for this application have accounted for such cumulative impacts in their modelling.

### **6.3.1. Identification of Potential Cumulative Impacts**

The proposal is located on land zoned for industrial and employment uses under SEPP WSEA. There is an expectation that the subject land will be used for the proposed purposes.

Given the scale of the project and its location within an emerging logistics precinct, assessment of cumulative impacts pays regard to the intended operations of warehouse and industrial facilities within the approved HLP as well as other industrial, manufacturing and warehousing activities in proximity to the site. These are generally located to the north of the former CSR estate, and also to the west towards Oakdale South.

As the proposal is for fit-out and use of an approved warehouse building, the potential cumulative impacts of this use with other nearby operations are more likely to result from operational parameters. Such factors include:

- Noise generation,
- Air quality, and
- Traffic generation,
- Hazard and Risk resulting from Dangerous Goods storage.

Matters such as construction noise, visual impact, biodiversity and the like will not be affected by the proposal as these matters do not change from what has been approved on the site previously.

### **6.3.2. Nearby Sensitive Receivers**

Sensitive receivers include residential dwellings to the south of HLP at Greenway Place and also to the north east fronting Burley Road.

### **6.3.3. Assessment of Cumulative Impacts**

The sections below set out the cumulative assessment of impacts and conclude that there will be no adverse cumulative impacts resulting from the proposed Jalco operation within the HLP. Indeed, from a noise and traffic generation perspective, it has been assessed that the proposed operation will reduce the cumulative impact on neighbouring lands.

#### **6.3.3.1. Noise**

The predicted Operational Noise Levels at the most affected receivers appropriately demonstrate that the resultant noise emissions generated by the proposed use will be consistent with that approved under SSD-10436 and the amended modification 1. It is noted that the noise and vibration modelling conducted by SLR consulting in preparation of the original SSD application included the appropriate modelling for the nearby industrial as well as the intended overall development for the HLP. The recommended amenity noise level is reduced by 5 dBA to account for cumulative noise from other developments in the industrial area.

Accordingly, as the proposed change of use and fit-out is consistent with the noise impacts identified for SSD-10436, the proposal will demonstrably maintain the appropriate acoustic amenity with consideration for the cumulative impacts of surrounding industrial sites.

#### **6.3.3.2. Air quality**

The air quality analysis prepared by SLR Consulting assessed the existing odour environment with consideration of the cumulative, off-site odour levels within the local area (within 2km radius). This data was

obtained from the Environment Protection Licences (EPLs) and the National Pollutant Inventory (NPI) database and identified the following potential sources of odour impacts:

- PGH Bricks and Pavers Horsley Park, approximately 1.4 km north; and
- George Borg Piggery Horsley Park, approximately 1.8 km northeast;

The subsequent analysis of the relevant modelling identified that the cumulative impacts of the proposal as well as the surrounding, potential odour sources will be unlikely to cause any adverse impacts at the surrounding sensitive receptors and would comply with the relevant ambient air quality and odour guidelines.

#### **6.3.3.3. Traffic**

The traffic assessment prepared by Ason Group has identified that the traffic generation of the proposed change of use will be less than the approved SSD-10436 and the approved SSD-10436 MOD 1 traffic generation. Of note, the traffic assessment conducted in support of SSD-10436 included the appropriate SIDRA analysis for the cumulative traffic impacts of the proposal as well as other developments in the area. It was determined that the area can accommodate the cumulative traffic without need for further upgrades, even during peak hours.

Accordingly, as the proposed change of use/fit-out will result in a reduced traffic generation, it is considered that the cumulative impacts of the proposal and the surrounding development can be appropriately accommodated within the existing road infrastructure.

#### **6.3.3.4. Hazardous Materials Storage**

Operation of the tenancy will involve the manufacturing washing liquids which are non-Dangerous Goods products however the raw inputs are classified as DGs. The quantities of goods to be stored exceed the limits listed in State Environmental Planning Policy 33 and as such a Preliminary Hazard Analysis was undertaken for the proposal to determine whether there is the potential for offsite impacts.

It is noted that there is no approval for the storage of Dangerous Goods within other warehouses approved under SSD-10436.

The PHA included a qualitative analysis of postulated scenarios and any scenarios that would not impact off site were eliminated from further assessment. Scenarios not eliminated were carried forward for consequence analysis.

A consequence analysis assessed in detail the potential and extent of offsite impact. This consequence analysis identified the need to undertake risk assessment in respect to the LPG tanks on site.

- The analysis found that the potential for fatality risk of 0.0012 chances per million per year (pmpy) at the site boundary is well within the acceptable risk criteria at the site boundary of 50 chances pmpy for industrial sites.
- A review of the scenarios that may lead to incident propagation shows that there were no incidents with radiant heat exceeding 23 kW/m<sup>2</sup> impacting over the site boundaries. Therefore, incident propagation would not be expected to occur.
- Based on the estimated injury risk conducted in the analysis, the risks associated with injury and nuisances at the closest residential area are not considered to be exceeded.
- A review of the proposed developments at the estate indicates there are no facilities currently proposed to exceed the SEPP 33 thresholds; hence, there would be no unacceptable cumulative risk within the estate. A review of the surrounding area further afield doesn't show there to be accumulations of facilities which would result in a cumulative impact based upon the proposed Jalco warehouse. Therefore, potential for cumulative risk to exceed the permissible criterion is not expected to occur.

As such the proposal is next expected to result in cumulative risk of injury as the level of expected impact assessed from the site would not generate a risk incident on a neighbouring site.

## 7. EVALUATION OF PROJECT

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

### 7.1. PROJECT DESIGN

This SSDA seeks consent for the change of use of the Warehouse 1 of Lot 201 (approved under SSD-10436 Modification 1) at Horsley Logistics Park to general industrial. This includes the fit-out for 24 hours / 7 days operation of a manufacturing facility for the production of liquid soap, detergent and home and personal care consumer liquid products. The SSDA includes the relevant fit-out details for the intended production and ancillary storage, including the essential infrastructure and facilities for the storage and handling of DGs. No physical built works are associated with the building, hardstand, car parking, truck parking or landscaping are proposed as part of this subject SSD as they have been facilitated by the consent issued via SSD-10436 and its associated MOD 1.

Accordingly, the proposed change of use/fit-out would create:

- 19,731sqm of manufacturing or warehouse floorspace in addition to 1,089sqm of supporting, ancillary floor space to meet projected market, production demand;
- 40 new construction jobs and 75 new operational jobs (50 warehouse, 25 office area); and
- Direct investment in critical, employment generating land use activities.

The proposed general industrial use and manufacturing seeks to support to the growing manufacturing sector within the NSW economy and aid in response to impacts of the COVID-19 Pandemic, providing an agile response to the changing markets. The proposed use will create a state-of-the-art facilitate manufacturing facility that will effectively support these wider NSW objectives while also supporting the intended land use objectives of the Western Sydney Employment Area.

#### Project Objectives

The objectives for this project are to

- Confirm a new operating location for Jalco Australia's liquid manufacturing facility, enabling relocation of this arm of the manufacturing business from the current operation at Smithfield. The Smithfield site is no longer fit for purpose to support the growing demand for liquid soap and cleaning products manufacture by Jalco,
- Ensure environmentally managed operational parameters for the Jalco use,
- Locate Jalco's operating facility close to synergistic uses of warehouse, distribution and industry on suitably zoned and environmentally capable land, and
- Manage and mitigate impacts arising to sensitive receivers surrounding the operation so as to not unreasonably impinge on the amenity of neighbours.

#### Alternatives Considered

Based on the above objectives, various project alternatives were considered in the detailed concept design. Two main options were identified, those being 'Do Nothing' and 'Alternative Designs and Layouts'.

In considering the two options, it was clear that the 'Do Nothing' alternative was non-viable as it would be contradictory to the proposal objectives and did not result in any positive outcomes. Rather, it would prevent the required need expand the Jalco operations from the existing facility at Smithfield into a new state-of-the-art facility that would meet growing demand and support best practices into environmental harm minimization. Otherwise, consolidation of the existing facility was not found to be viable, and the abandonment of the market would not be in the best interest of Jalco or the broader community.

Each of the 'Alternative Design and Layouts' included the consideration of other sites across Western Sydney. This process included a comprehensive assessment of the associated pros and cons of each site.

Through this process, Warehouse 1 at the HLP was identified and subsequently, a range of options for site access and tenancy layout were explored. The proposed access from Johnston Crescent and Old Walgrove Road is considered an optimal location and the design has been strategically selected in accordance with the WSEA SEPP. While other arrangements and designs for the proposed development are possible, the proposed arrangement is deemed optimal for the location based upon functionality, long term financial viability, off-site amenity impacts and the necessary tenancy size and amenity.

The warehouse and bottle storage areas are chosen to be at the north of the building towards the driveway is to minimise truck delivery/residence time on site and to avoid traffic congestions, as well as to utilise the recess docks for warehousing and container loading purpose. The location of these uses was dictated by the location of roller shutter doors to the northern edge of the warehouse. An analysis of different building orientations was considered as part of SSD-10436, the location of RSDs and northern hardstand was identified as most appropriate given their distance from the rural residential noise receivers south of the estate.

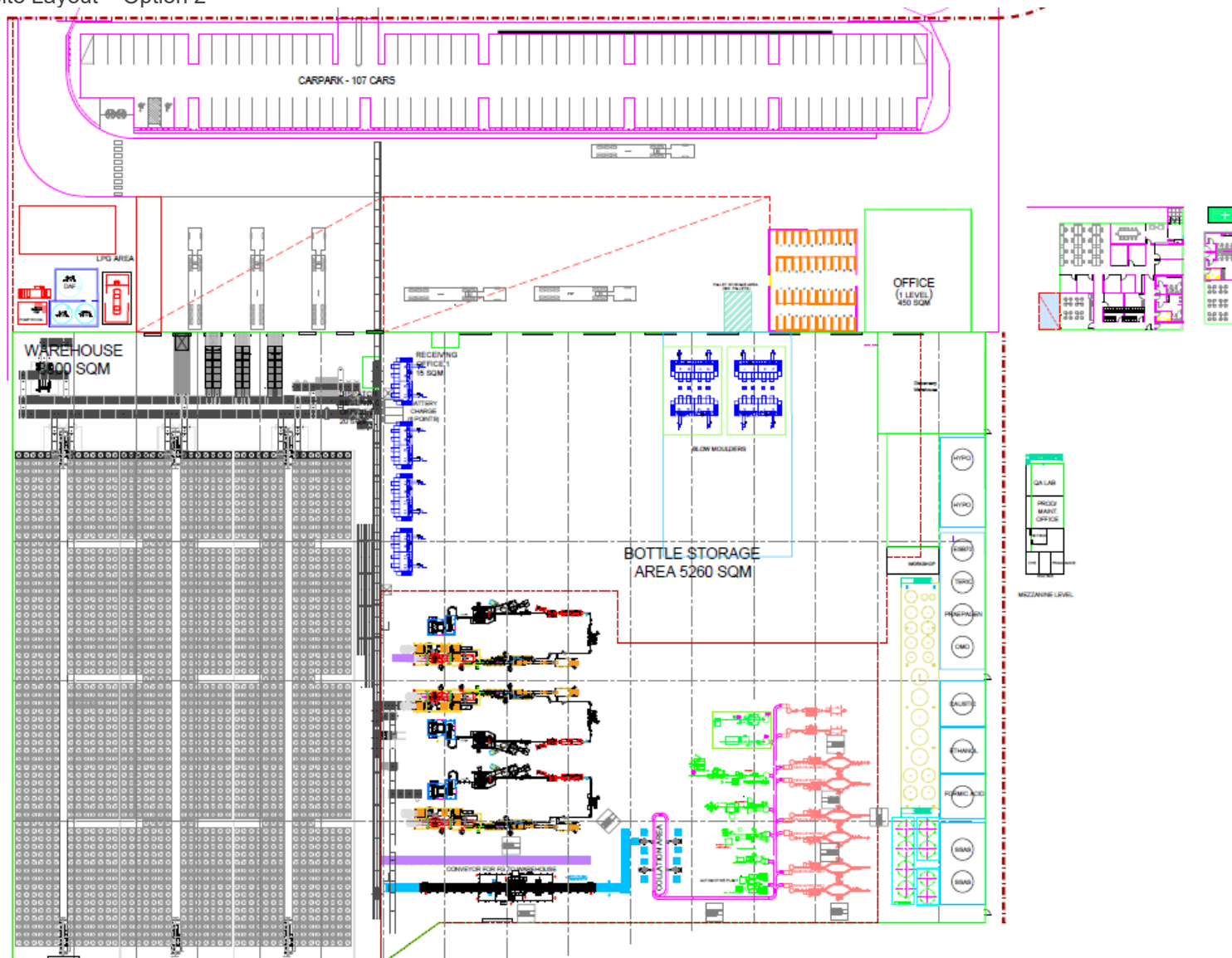
Multiple layouts have been considered and the current layout has been chosen as it supports the operations model, production process flow and significantly minimises the forklift moments within the facility – thus improving site safety. Each layout was extensively analysed to understand operational movements within the building, specifically the forklift operation interaction with employees within the site. Ultimately, the final design was chosen as it provided the safest interaction between human and forklift movements as the mixing tanks and operation lines were contained separately to the bottle storage and warehouse components. Any amendments to the layout have significant risk associated with health and safety on site during the operational phase. Examples of alternative designs considered are presented below in **Figure 22** to **Figure 25**.



URBIS  
SSD-21190804 - JALCO ENVIRONMENTAL IMPACT STATEMENT



Figure 23 Proposed Site Layout – Option 2



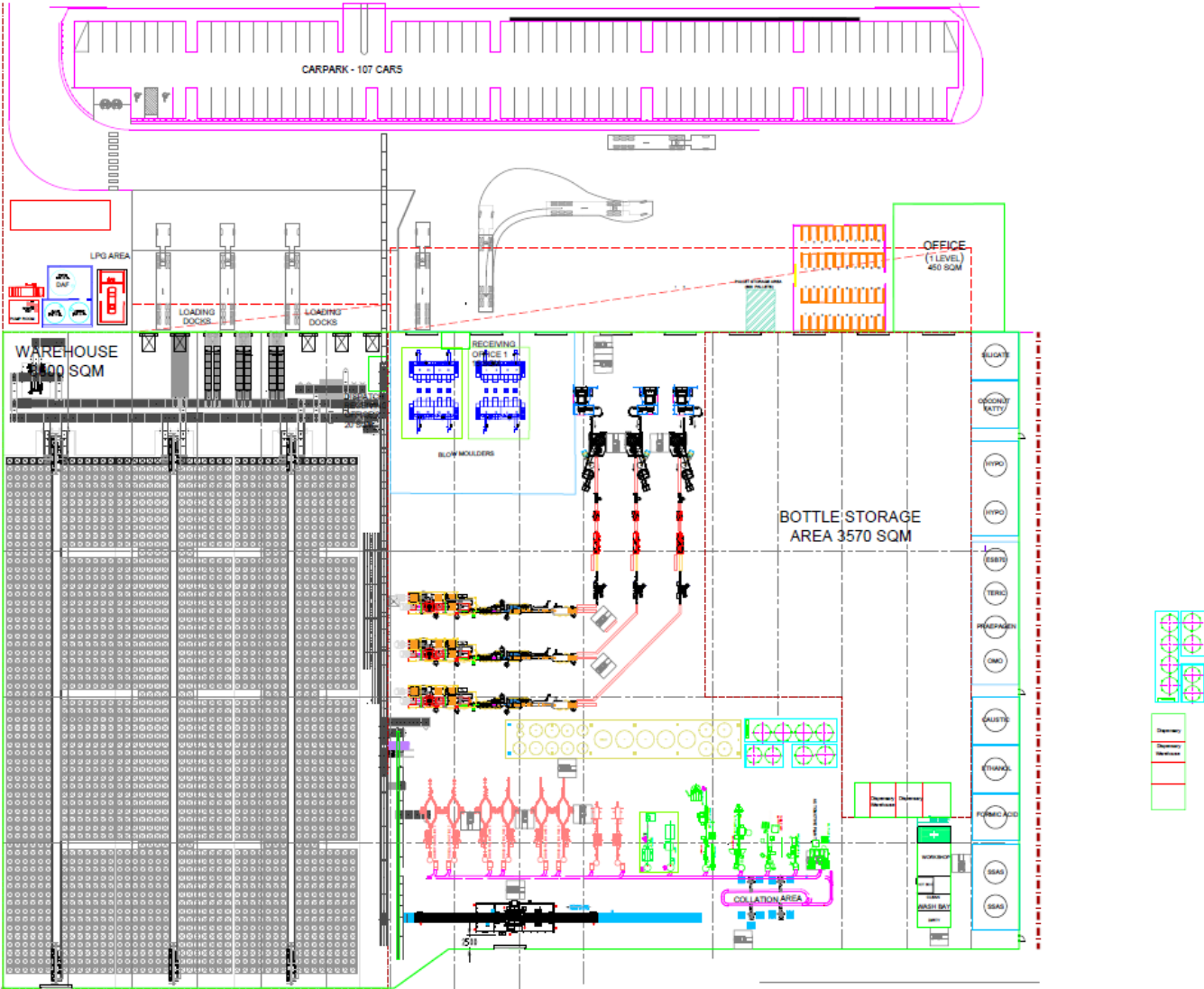
Source: Jalco, 2021

The detailed site plan illustrates the layout of the 'Bottle Storage Area' (2600 SQM). Key features include:

- Warehouse (500 SQM):** Located on the left, featuring multiple loading docks and a LPG area.
- Office (1 Level, 450 SQM):** Situated on the right side of the plan.
- Carpark (107 Cars):** Located at the top of the plan.
- Bottle Storage Area (2600 SQM):** The central large area for bottle storage.
- Processing Units:** Includes blow moulders, extruders, and other manufacturing equipment.
- Infrastructure:** Features a battery charging station, a conveyor system for material transport, and various utility areas.
- Legend:** A color-coded legend at the bottom right identifies different functional zones and equipment.

## EVALUATION OF PROJECT

Figure 25 Proposed Site Layout – Option 4



Source: Jalco, 2021

## Mitigation Measures

The mitigation measures identified for incorporation into the project fit-out and operation are grouped by issue below.

### ▪ Traffic Impact Mitigation

Similarly as required by SSD-10436:

- Traffic control would be required to manage and regulate traffic movements into and out of the site during construction.
- Disruption to road users would be kept to a minimum by scheduling intensive delivery activities outside of peak network hours.
- Construction and delivery vehicles would be restricted to using Old Wallgrove Road, Lenore Drive, M7 Motorway and Mamre Road.

### ▪ Noise & Vibration

- 18mm marine plywood internal lining fixed to inside of purlins to the Southern elevation of Liquid Packaging Area. The plywood lining is required have a minimum surface density of 10 kg/m<sup>2</sup> and form a continuous layer to the full height of the 0.48mm steel external wall.
- Four-sided enclosure to rooftop fans, minimum enclosure height 1.0m above fan height.
- Acoustic louvres to the Southern elevation of Liquid Packaging Area, specified as NAP 300 H-line, Fantech SBL1 or equivalent.

### ▪ Fire & Safety

- Preparation of a fire safety strategy to address the specific hazards identified in the development

### ▪ Hazard & Risk

- The warehouse and/ or site boundaries are capable of containing 702m<sup>3</sup> of water storage required to meet the needed 7.8m<sup>3</sup>/min of discharge for the warehouse fire, sprinkler activation and contaminated water release.
- A storm water isolation point (i.e. penstock isolation valve) is to be incorporated into the design. The penstock shall automatically isolate the storm water system upon detection of a fire (smoke or sprinkler activation) to prevent potentially contaminated liquids from entering the water course.

### ▪ Stormwater & Drainage

- Jalco operation management procedures including fixed purge amounts, re-use of cleaning water as well as waste water flow rate and treatment management. This is to appropriately respond to managing water quality and quantity generated by the Jalco operations.
- Rainwater effect management to manage the cumulative impacts of trade waste and rainwater flow.
- Containment water retention to minimize the potential impacts for holding contaminated water and DGs at the site.

### ▪ Air Quality

- Ensure all equipment are maintained in good condition and serviced as per manufacturer's recommendations.
- Inspect the site daily and apply good housekeeping in general. General measures will include ensuring the timely clean-up of any spills as well as identifying and rectifying any leaks that could contribute to fugitive emissions.
- Any modifications to the proposed design should consider positioning emission sources as far as practicable from neighbouring receptors.

- Manage vehicle emissions by minimising idling times and installing signage to instruct drivers to turn off engines while loading/unloading etc.
- Complaints should be investigated as soon as possible so that effective appraisal of the complaint can be carried out by subjective **assessment**.
- Bushfire
  - No additional mitigation measures required beyond those adopted for SSD-10436.
- Waste Management
  - The detail contained in the Waste Management Plan will inform the location and specifications for a dedicated waste storage area within the Jalco tenancy, to be detailed for Construction Certificate stage. Additional waste management measures, including waste servicing, waste avoidance, re-use and recycling, communication strategies, signage, monitoring, and reporting are discussed in the WMP and should be implemented in the operational phase of the development.
- ESD
  - Water management - in accordance with the existing procedures established in existing Jalco sites, the appropriate water flow management will be established for the relevant cleaning, waste-water treatment and rainwater flow. Additionally, the appropriate containment measures will be established for the hazardous water containment.
  - Achievement of BCA Section J Energy Efficiency for the base building, as approved under SSD-10436.
  - Requirement to ensure additional fit-out works for the proposed Jalco operation, including air conditioning, light & power, hot water supply achieve the requirements of BCA Section J.
- Greenhouse Gas and Energy Efficiency
  - It is recommended that the building be verified against a reference building using the Verification Method JV3. This will determine if the proposed development and its services has an equal or less annual energy consumption of the reference building. Compliance and how it is achieved should be documented in a report by an appropriately qualified engineer for certification.
- Environmental Management
  - The operation will require the issue of an Environmental Protection Licence to inform its daily operations.

## 7.2. STRATEGIC CONTEXT

The proposal aligns with the strategic direction and objectives established within the broader strategic context established by the NSW Region Plan and District Plan as demonstrated in **Section 2**. Additionally, the proposal aligns with the employment and transport accessibility objectives of the NSW State Priorities, Better Placed Priorities and Future Transport Strategy 2056.

The development presents a design solution that respects the important role of the site in providing a secure and reliable supply of employment land in the WSEA to meet project future demand over the next decade.

Adequate consideration has been given to the relevant strategic policies as required by the SEARs and provided in **Section 2** of this EIS and finds the site to be suitable for the proposed industrial use from a strategic point of view.

## 7.3. STATUTORY CONTEXT

The proposed development has been assessed in accordance with the relevant matters for consideration listed in Section 4.15 of the EP&A Act.

### 7.3.1. Environmental Planning Instruments

The relevant State and local environmental planning instruments are listed in Section 4 and assessed in detail within **Appendix C**. The assessment concludes that the proposal complies with the relevant provisions within the relevant instruments as summarised below:

- The proposed development has been assessed and designed in respect to the relevant objects of the EP&A Act as defined in Section 1.3 the Act.
- This EIS has been prepared in accordance with the SEARs as required by Schedule 2 of the EP&A Regs.
- Consideration is given to the relevant matters for consideration as required under the BC Act. The appropriate BDAR waiver has been sought and acquired accordingly.
- This SSDA pathway has been undertaken in accordance with the SRD SEPP as the proposed development is classified as SSD.
- The Proposal complies with all of the relevant provisions under the WSEA SEPP as detailed in **Appendix C**. The proposed development is consistent with the objectives of the IN1 General Industrial zone.
- The proposed development has been assessed in accordance with SEPP No. 33, SEPP No. 55, SEPP (Vegetation in Non-Rural Areas) 2017 and SEPP Infrastructure 2007. The proposed development complies with the relevant clauses of these SEPPs.

As demonstrated above and in detail in **Appendix C**, the proposed development has been assessed against, and complies with the relevant statutory framework

### 7.3.2. Draft Environmental Planning Instruments

No draft environmental planning instruments are relevant to this proposal.

### 7.3.3. Development Control Plan

WSEA - Fairfield Development Control Plan (**the DCP**) provides detailed planning controls which are relevant to the site and surrounding locality. However, clause 11 of the SRD SEPP states that DCPs do not apply to State significant development.

Where relevant, the DCP controls have been addressed on a merit basis in **Section 6** of the EIS so the proposed development is compatible and consistent with the existing, approved and likely future development in the locality, including relevant technical requirements (e.g. public domain, stormwater, etc).

### 7.3.4. Planning Agreement

CSR have entered into a Voluntary Planning Agreement (**VPA**) (SVPA reference no. SVPA-2016-8153) which provides that CSR will carry out road works and will make monetary contributions of \$182,898 per hectare of net developable area for the purposes of regional transport infrastructure and services provision within the meaning of clause 29 of the WSEA SEPP.

The above VPA is currently the sole responsibility of CSR and has been paid by CSR. ESR previously contracted the land and settlement was conditional on all subdivision and remediation works being complete by CSR.

### 7.3.5. Regulations

This application has been prepared in accordance with the relevant provisions of the EP&A Regulation.

### 7.3.6. Likely Impacts of the Proposal

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** the proposal addresses the principles of ecologically sustainable development (ESD) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and as outlined below:

- Precautionary principle: The precautionary principle relates to uncertainty around potential environmental impacts and where a threat of serious or irreversible environmental damage exists, lack of scientific certainty should not be a reason for preventing measures to prevent environmental degradation.

This EIS has not identified any serious threats of environmental damage that cannot be adequately mitigated or addressed based on current scientific standards and best practices. In this regard, the proposed development can be considered generally consistent with the precautionary principle.

- Intergenerational equity: Intergenerational equity ensures the needs of future generations are considered in decision making and that environmental values are maintained or improved for the benefit of future generations.

The proposed development is intended to benefit both the current and future generations and incorporates adequate environmental protection and impact mitigation measures to ensure environmental values are maintained and improved as a result of the development.

- Conservation of biological diversity and ecological integrity: The Planning Secretary of the Department of Planning, Industry and Environment and the Chief Executive of the Environment, Energy and Science Group of the Department have determined that the proposed development is not likely to have any significant impact on biodiversity values. A BDAR waiver has been issued in this regard.
- Improved valuation, pricing and incentive mechanisms: This requires the holistic consideration of environmental resources that may be affected as a result of the development including air, water and the biological realm. It places a high importance on the economic cost to environmental impacts and places a value on waste generation and environmental degradation.

The proposal has considered the environmental values of the site and the likely impacts of the development, particularly during operational activities. Mitigation measures to address ESD impacts include:

- Water management – implementation of an operational water management measures similar to that informing operations at Jalco’s current facilities, to minimise water use and manage water contamination.
  - Achievement of BCA Section J Energy Efficiency for the base building, as approved under SSD-10436.
  - Requirement to ensure additional fit-out works for the proposed Jalco operation, including air conditioning, light & power, hot water supply achieve the requirements of BCA Section J.
- **Built Environment**: The proposal does not include any substantial built works beyond the approved warehouse under SSD-10436 Mod-1. The proposal will respect to the surrounding road network and adjoining landowners. The proposal will be consistent with the overarching structure of the HLP.
  - **Social**: The proposal seeks to deliver employment uses to support the lifestyle of future residents and current residents within Western Sydney, by providing jobs closer to home as envisaged by the relevant strategies. The proposal will not result in any undue social impacts and will provide an improved outcome.
  - **Economic**: The proposal will contribute to 40 immediate construction jobs and 75 operational jobs. Furthermore, the proposal will facilitate the appropriate growth of Jalco’s production in accordance with current demands. The proposal assist in the delivery of transport infrastructure within the wider WSEA as per the Voluntary Planning Agreement (VPA) (SVPA reference no. SVPA-2016-8153) for a monetary contribution of \$182,898 per hectare of net developable area for the former CSR site.
  - **Cumulative**: the level of impacts resulting from the proposal, having regard to the known and expected future operations of development within the former CSR estate and the broader WSEA area, are not expected to contribute to an increase in cumulative impacts on neighbouring lands. Indeed, the expected level of impact generated by traffic and noise generation is expected to be lower than that assessed and approved via SSD-10436.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within **Section 6** and as summarised in **Appendix E** to this EIS.



### 7.3.7. Suitability of the Site

The site is considered highly suitable for the proposed development for the following reasons:

- The proposed land use is permissible in the IN1 General Industrial and the development is consistent with the zone objectives as established in the WSEA SEPP.
- The proposal is consistent with the relevant State and Local strategic and statutory policy.
- The relevant warehouse and wider site has been appropriately established for industrial land uses and is supported by the appropriate carparking, road infrastructure as well as utility infrastructure and services connection. The intended manufacturing use can operate from both a utility and traffic point of view.
- The proposal is consistent with the character and uses of the wider industrial warehousing and future land uses of the HLP as well as the wider CSR estate.
- The detailed impact assessment undertaken for the proposed fit-out demonstrates that the proposed development can occur without any unacceptable environmental impact, subject to the implementation of the Waste Management Plan, Emergency Management Plan and Operational Noise Management Plan.

### 7.3.8. Submissions

It is acknowledged that submissions arising from the public notification of this application will need to be assessed by Council.

### 7.3.9. Public Interest

The proposed development is considered in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic plans and substantially complies with the relevant State and local planning controls.
- No adverse environmental, social or economic impacts will result from the proposal.
- The proposal will provide 75 jobs within a land identified for industrial employment uses.
- No issues specifically relating to the fit-out or use of Warehouse 1 were raised during pre-lodgement community consultation.

## 7.4. SUMMARY AND CONCLUSION

This EIS has assessed the environmental, social and economic impacts of the proposed change of use to General Industrial with ancillary warehouse and distribution, and fit-out works to support operation of Warehouse 1 at Lot 201, Holsey Logistics Park, 8 Johnson Crescent Horsley Park, for the purposes of a liquid chemical manufacturing facility for Jalco Australia. It has addressed the issues identified in the SEARs and prepared in accordance with the EP&A Regulation.

Having regard for the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the proposed development is justified for the following reasons:

- The proposal has been assessed as consistent with the applicable planning framework for the site, including Stage and Local planning instruments. A BDAR Waiver has been issued, demonstrating there will be no impact on site biodiversity. It is noted that an Environmental Protection Licence will be required to inform site operation and environmental management.
- A detailed analysis of the impacts resulting from the proposal has identified that the anticipated externalities are anticipated to be minimal. As the proposal is for fit-out and use of an already approved building, the following summarises the likely impacts
  - Anticipated reduction in traffic generation than that assessed as acceptable for the site under SSD-10436.
  - Noise generation has been modelled to be below the approved noise criteria contained within SSD-10436.

- The chemicals to be brought to and stored on site, including Dangerous Goods, have been assessed as remaining within the acceptable risk criteria; hence, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.
- Odour levels generated from the site are anticipated to fall well below the adopted odour impact criterion of 2 ou.
- Issues such as bushfire risk, operational waste management, ESD and minimisation of greenhouse gas and energy use have all been assessed as acceptable in relation not the proposal.

Mitigation measures identified in relation to the above matters can be adequately accommodated as conditions of consent on the approval so as to ensure ongoing mitigation of any impacts resulting.

- The subject site, located within the Western Sydney Employment Area and approved for use as a warehouse and distribution hub is highly suited to accommodating use of the proposed chemical manufacturing facility. The site has been remediated under previous development consents and remains suitable for the proposed purpose. The HLP will in time house numerous synergistic uses by way of warehouse & distribution tenants, which will complement and not impinge on the proposed Jalco operation.
- Pre-lodgement community and agency stakeholder engagement was undertaken however no issues specific to the use or fit-out of the Jalco operation were raised.
- Overall, it is considered that the proposed use is highly compatible with the type of development expected for the subject site, and the operation will not generate impacts that will materially impinge on the amenity of nearby sensitive receivers. Mitigation measures will be imposed so to ensure long term management of any potential impact. The opportunity for Jalco to relocate its current chemical manufacturing facility from Smithfield to Warehouse 1 Lot 201 within HLP will support the proponent's ability to service increased market demand for its products in a way that is environmentally managed and suitable to the site and context.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

# DISCLAIMER

This report is dated 8 November 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of JALCO AUSTRALIA PTY LTD (**Instructing Party**) for the purpose of Environmental Impact Statement (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

**APPENDIX A**

**SEARS COMPLIANCE TABLE**

## **APPENDIX B**

## **ARCHITECTURAL DRAWINGS**

APPENDIX C

STATUTORY COMPLIANCE TABLE

## **APPENDIX D**

## **COMMUNITY ENGAGEMENT OUTCOMES REPORT**

## **APPENDIX E**

## **MITIGATION MEASURES & ENVIRONMENTAL RISK ASSESSMENT**



## **APPENDIX F**

## **AIR QUALITY IMPACT ASSESSMENT**

## **APPENDIX G**

## **BCA ASSESSMENT REPORT**

## **APPENDIX H**

## **BCA ASSESSMENT MEMO**

## **APPENDIX I**

## **COST ESTIMATE SUMMARY**

## **APPENDIX J**

## **DANGEROUS GOODS DESIGN REPORT**

## **APPENDIX K                      FIRE SAFETY STRATEGY**

### **K.1                      FIRE SAFETY STRATEGY PLANS**

## **APPENDIX L**

## **OPERATIONAL NOISE IMPACT ASSESSMENT**

## **APPENDIX M**

## **PRELIMINARY HAZARD ANALYSIS**



## **APPENDIX N**

## **TRANSPORT STATEMENT**

## **APPENDIX O**

## **WASTE MANAGEMENT PLAN**

## **APPENDIX P**

## **CONTAMINATED WATER RETENTION**

## **APPENDIX Q**

## **SERVICES CHANGE OF USE LETTER**

## **APPENDIX R**

## **BDAR WAIVER APPROVAL SSD**

## **APPENDIX S**

## **LIQUID PROCESS FLOW DIAGRAM**

## **APPENDIX T**

## **BUSHFIRE PROTECTION ASSESSMENT**

## **APPENDIX U**

## **ENVIRONMENT PROTECTION LICENCE 2746**



