

Ref: **SSD-18204994**  
WTJ21-057



# WILLOWTREE PLANNING

## **RESPONSE TO SUBMISSIONS: PROPOSED INDUSTRIAL FOOD MANUFACTURING FACILITY**

2 AND 14 DISTRIBUTION DRIVE, ORCHARD HILLS  
LOT 10 AND 11 DP 271141

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Prepared by Willowtree Planning Pty Ltd  
on behalf of Snack Brands Australia

**3 February 2022**



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**WILLOWTREE**  
PLANNING






**RESPONSE TO SUBMISSIONS REPORT**

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

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## TABLE OF CONTENTS

|  |           |
|--|-----------|
| <b>TABLE OF CONTENTS .....</b>   | <b>ii</b> |
| <b>FIGURES .....</b>   | <b>iv</b> |
| <b>TABLES .....</b>  | <b>iv</b> |
| <b>PART A PRELIMINARY .....</b>  | <b>6</b>  |
| 1.1 PROJECT OVERVIEW .....   | 6         |
| 1.2 APPLICATION PROCESS OVERVIEW .....                                   | 6         |
| 1.3 PURPOSE OF THIS REPORT .....   | 7         |
| 1.4 CHANGES TO THE PROPOSAL AS EXHIBITED .....                           | 7         |
| <b>PART B SUMMARY OF SUBMISSIONS .....</b>                               | <b>8</b>  |
| 2.1 SUBMISSIONS PROCESS .....  | 8         |
| 2.2 SUBMISSIONS RECEIVED .....   | 8         |
| <b>PART C RESPONSE TO SUBMISSIONS .....</b>                              | <b>9</b>  |
| 3.1 RESPONSE TO AGENCY SUBMISSIONS .....                                 | 9         |
| 3.2 RESPONSE TO PUBLIC AND OTHER STAKEHOLDER SUBMISSIONS .....           | 59        |
| <b>PART D SUMMARY OF CHANGES .....</b>                                   | <b>60</b> |
| 4.1 PROJECT DESCRIPTION .....  | 60        |
| 4.2 OPERATIONS .....   | 61        |
| 4.2.1 Staff .....  | 62        |
| 4.2.2 Customer and visitors .....  | 62        |
| 4.2.3 Deliveries and truck movements .....                               | 62        |
| 4.2.4 End product customers .....  | 63        |
| 4.2.5 Food production .....  | 63        |
| 4.2.6 Mechanical plant .....   | 65        |
| 4.3 BUILT FORM .....   | 68        |
| 4.3.1 Landscaping .....  | 68        |
| 4.3.2 Signage .....  | 70        |
| <b>PART E PROJECT JUSTIFICATION .....</b>                                | <b>74</b> |
| 5.1 JUSTIFICATION .....  | 74        |
| 5.1.1 Supports State, Regional and Local Planning Objectives .....       | 74        |
| 5.1.2 Demonstrates an Appropriate Use of a Permissible Development ..... | 75        |
| 5.1.3 Minimises Environmental Impacts .....                              | 75        |
| 5.1.4 Creates Compatibility with Surrounding Development .....           | 75        |
| 5.1.5 Delivers Ecologically Sustainable Development .....                | 75        |
| 5.2 CONCLUSION .....   | 76        |
| <b>APPENDIX A SUBMISSIONS REGISTER .....</b>                             | <b>79</b> |
| <b>APPENDIX B UPDATED MITIGATION MEASURES .....</b>                      | <b>83</b> |
| ADMINISTRATIVE COMMITMENTS .....   | 84        |
| Commitment to Minimise Harm to the Environment .....                     | 84        |





## RESPONSE TO SUBMISSIONS REPORT

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

|  |           |
|--|-----------|
| Terms of Approval.....                           | 84        |
| Occupation Certificate .....                     | 85        |
| Structural Adequacy.....                         | 85        |
| Operation of Plant and Equipment.....            | 85        |
| Construction Environmental Management Plan ..... | 85        |
| Monitoring of State of Roadways.....             | 85        |
| Waste Receipts.....                              | 85        |
| Complaints Handling .....                        | 85        |
| Consultation .....                               | 86        |
| SPECIFIC ENVIRONMENTAL COMMITMENTS .....         | 86        |
| Air Quality.....                                 | 86        |
| Noise and Vibration.....                         | 86        |
| Traffic and Transport.....                       | 86        |
| Aboriginal Cultural Heritage .....               | 87        |
| Waste Management.....                            | 87        |
| Dangerous Goods.....                             | 87        |
| <b>APPENDIX C SUPPORTING INFORMATION.....</b>    | <b>88</b> |





## FIGURES

|          |   |    |
|----------|---|----|
| Figure 1 | SBA Delivery Diagram (Source: SBA, 2021).....                                 | 63 |
| Figure 2 | Operational Flow Diagram (Source: SBA, 2021) .....                            | 64 |
| Figure 3 | Wastewater Treatment Plant Process (Source: SBA, 2021).....                   | 67 |
| Figure 4 | Updated Landscape Plan (Source: Geoscapes, 2021).....                         | 69 |
| Figure 5 | Updated Landscape Sections (Source: Geoscapes, 2021) .....                    | 69 |
| Figure 6 | Context of existing SBA warehouse signage (Source: nettletontribe, 2020)..... | 70 |
| Figure 7 | Example Signage Content (Source: SBA, 2022).....                              | 70 |

## TABLES

|  |    |
|--|----|
| TABLE 1: RESPONSE TO AGENCY SUBMISSIONS .....  | 9  |
| TABLE 2: PROPOSED DEVELOPMENT PARTICULARS..... | 60 |
| TABLE 3: STAFF SHIFT NUMBERS .....             | 62 |
| TABLE 4: PRODUCT INPUTS/OUTPUTS .....          | 65 |
| TABLE 5: PROPOSED SIGNAGE DETAILS.....         | 70 |
| TABLE 6: SEPP 64 ASSESSMENT CRITERIA.....      | 71 |





## APPENDICES

|                     |   |
|---------------------|---|
| <b>Appendix A</b>   | Submissions Register                            |
| <b>Appendix B</b>   | Updated Mitigation Measures                     |
| <b>Appendix C</b>   | Supporting Information                          |
| <br>                |   |
| <b>Appendix C1</b>  | Updated Architectural Plans                     |
| <b>Appendix C2</b>  | Updated Landscape Plan                          |
| <b>Appendix C3</b>  | Engineering Response Letter                     |
| <b>Appendix C4</b>  | Transport Response Letter                       |
| <b>Appendix C5</b>  | Updated Noise and Vibration Impact Assessment   |
| <b>Appendix C6</b>  | Updated Air Quality and Odour Impact Assessment |
| <b>Appendix C7</b>  | Existing Operations Complaints                  |
| <b>Appendix C8</b>  | SBA Environmental and Sustainability Policy     |
| <b>Appendix C9</b>  | Preliminary Design and Construction Programme   |
| <b>Appendix C10</b> | Trade Waste Transfer Plan                       |
| <b>Appendix C11</b> | Servicing Information                           |





## PART A PRELIMINARY

### 1.1 PROJECT OVERVIEW

Snack Brands Australia Pty Ltd (SBA) has played a key role in overall market growth of snack products, leveraging its strategic relationships across both retail and wholesale trade, building brands, continually innovating, and driving overall sales from humble beginnings of 15 million packs per year, to its current day at over 200 million. Of course, to produce volumes of this magnitude, SBA also leverages an extensive network of Australian farmers, sourcing 100% of its potato and corn requirement and continuing its proud history to provide all Australians with Australian grown and manufactured snacks.

This proposal seeks to develop an industrial food manufacturing facility adjacent to the existing SBA distribution centre at Orchard Hills. Currently SBA manufactures food products at two separate facilities located in Blacktown and Smithfield, before transporting the finished goods to Orchard Hills distribution centre for storage and later distribution. The proposed development seeks to consolidate the two existing manufacturing facilities into one new facility adjacent to the distribution centre.

The proposed development consists of an industrial food manufacturing facility, adjacent to the recently constructed warehouse and distribution centre of SSD-9429. The proposed development would be operated by SBA, concurrently with the neighbouring site, involving:

- a new purpose-built warehouse to operate as a food manufacturing facility (approximately 27,538m<sup>2</sup>) at 14 Distribution Drive, Orchard Hills; and
- an adjustment to the operations of the existing warehouse and distribution centre at 2 Distribution Drive, Orchard Hills, to include industrial food manufacturing (conversion of 5,217m<sup>2</sup>).

In response to the operational needs of SBA at a regional and national scale, it has been determined that the proposed purpose-built facility is required to support the growth of the business and increasing demand for their products.

The proposed development would assist in providing new employment opportunities through the provision of a manufacturing facility associated with adjoining warehouse and logistics land uses to facilitate employment-generating development and economic growth of the Mamre West Precinct within the Western Sydney Employment Area (WSEA). The proposal will also contribute to greater productivity and a significant increase in jobs for the Western Sydney Aerotropolis (WSA) in the industrial and logistics sector.

The proposed development, for the purposes of a manufacturing facility is considered consistent with the strategic direction of both the Western City District Plan published by the Greater Sydney Commission and the WSA Plan published by the Western Sydney Planning Partnership and the NSW Government. Additionally, the proposed development will further contribute to the growth of jobs in the WSEA; hence, contributing to the Western City District's economic growth.

### 1.2 APPLICATION PROCESS OVERVIEW

Development consent is being sought for the proposal, as State Significant Development (SSD), under Division 4.1, Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In accordance with section 89F of the EP&A Act and the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), the Environmental Impact Statement (EIS) for the proposal is required to be placed on exhibition for not less than 30 days.





The proposal was exhibited from 13 September 2021 to 13 October 2021, during which a number of submissions were provided to the NSW Department of Planning and Environment (DPE), as discussed herein.

Submissions received by NSW DPE outside the exhibition period have also been addressed in this report.

### **1.3 PURPOSE OF THIS REPORT**

The purpose of this Response to Submissions (RTS) Report is to detail and respond to matters raised in the submissions received for SSD-18204994.

The RTS report has been set out to address each submission matter, and is structured as follows:

|                   |  |
|-------------------|--|
| <b>PART A</b>     | provides an overview of the project, the application process and the RTS Report purpose and structure;                             |
| <b>PART B</b>     | provides a detailed response table of the submissions received;  |
| <b>PART C</b>     | provides responses to each of the issues raised in submissions received;   |
| <b>PART D</b>     | provides a revised project description and addresses an additional environmental assessment requirements;                          |
| <b>APPENDIX A</b> | provides a summary of the submissions received;  |
| <b>APPENDIX B</b> | provides a revised set of project management and mitigation measures, following the review of submissions and technical responses; |
| <b>APPENDIX C</b> | provides copies of any supporting information required by the received submissions.  |

### **1.4 CHANGES TO THE PROPOSAL AS EXHIBITED**

Following the exhibition phase, and upon review of all submissions received, several amendments have been made to the proposal. These amendments include:

- Increased provision of landscaping, which has resulted in the loss of 8 car parking spaces;
- Update project description, to include the provision of temporary truck parking on the residual land area;
- Inclusion of business identification signage; and
- Updated management and mitigation measures, relating to noise.





## **PART B SUMMARY OF SUBMISSIONS**

### **2.1 SUBMISSIONS PROCESS**

The proposal was exhibited from 13 September 2021 to 13 October 2021, during which a number of submissions were provided to the NSW DPE.

Clause 82 of the EP&A Regulation permits the Planning Secretary of the NSW DPE to request that the Applicant to provide a written response in relation to the issues raised within any submissions made during public exhibition. This RTS Report aims to fulfil the request from the Planning Secretary.

Submissions received by NSW DPE outside the exhibition period have also been addressed in this report.

### **2.2 SUBMISSIONS RECEIVED**

A total of eleven (11) submissions were received during the exhibition period, all of which have been received from government agencies, as summarised below:

- NSW DPE
- NSW Department of Primary Industries (DPI) Agriculture
- Environment, Energy and Science Group (EES) in the NSW DPE
- Endeavour Energy
- NSW Environment Protection Authority (EPA)
- Fire and Rescue NSW (FRNSW)
- Heritage NSW
- Penrith City Council
- Transport of NSW (TfNSW)
- Sydney Water
- Rural Fire Service

Of the eleven (11) submissions, we note the following:

- Three (3) submissions provide support, no comment and/or conditions of consent
- Eight (8) submissions provide comment and request additional information





## PART C RESPONSE TO SUBMISSIONS

### 3.1 RESPONSE TO AGENCY SUBMISSIONS

This section seeks to tabulate all submissions received from government agencies and provide a detailed response to each matter.

| TABLE 1: RESPONSE TO AGENCY SUBMISSIONS |                     |   |  |
|---|---------------------|---|--|
| SUBMITTER                               | MATTERS RAISED      | COMMENTS / REQUESTS   | FORMAL RESPONSE  |
| NSW DPE                                 | Project Description | The project description in Section 3.2 and Table 7 provides the particulars of the combined operations (the proposed development + the existing Warehouse and Distribution Facility SSD-9429). However, the Department understands the Applicant is not seeking consent for the combined operations.<br><br>Therefore, the Department requests the Applicant provide the development particulars only relating to the proposed manufacturing facility including but not limited to site area, Floor Space Ratio (FSR) and employment numbers. | Reference should be made to <b>TABLE 2</b> of this RTS Report, which includes clarification of the parameters associated with the proposed development in isolation.                     |
|   |                     | Table 9 of the EIS identifies the product inputs and outputs of the development's operations. However, other materials and products are delivered to the site including oils, flours and seasoning products which have not be identified in Table 9. Further information is required on the quantities (daily, weekly and annually) delivered to the site and the location of delivery acceptance on the site.  | Reference should be made to <b>TABLE 4</b> of this RTS Report, which include further detail on the quantity of oils, flours and seasoning products required for the proposed operations. |
|   |                     | The development includes the construction and operation of a wastewater treatment plant. Further information on the operations and treatment processes of the proposed wastewater treatment plant including information on development wastewater sources to be treated and the transfer of the wastewater to the wastewater treatment plant is required.   | <b>Section 4.2.6.6</b> of this RTS Report provides further information on the operations and processes associated with the proposed wastewater treatment plant.                          |





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SSD-18204994

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER | MATTERS RAISED | COMMENTS / REQUESTS  | FORMAL RESPONSE  |
|-----------|----------------|--|--|
|           |                | Section 3.2.4.6 of the EIS stipulates pellet and sheeted snacks are proposed to be produced from the multipurpose plant. Further information on the raw materials input required for the production of pellet and sheeted snack products is requested.   | <b>Section 4.2.6.4</b> of this RTS Report provide further information on the raw materials input required for the production of pellet and sheeted snack products.   |
|           | Residual Land  | The northern boundary of the site is proposed to remain undeveloped as residual land for use as temporary truck parking and the EIS stipulates the residual land is not included as part of this SSD application. However, this contradicts the Architectural Plans and Landscape Plans which indicate the residual land will be used as an erosion and sediment control basin during construction and layered with compacted aggregate to engineering standards to sustain truck parking. Please confirm whether development consent is sought for works within and use of the residual land for heavy vehicle parking. | It is confirmed that the northern residual land would be used as an erosion and sediment control basin during construction and layered with compacted aggregate (to engineering standards) to sustain truck parking, on a temporary basis.<br><br>This RTS Report has been updated to reflect these comments, as provided in <b>Section 4.1</b> .  |
|           |                | Should use of the residual land form part of the SSD, justification should be provided for the proposed use. If the residual land temporary truck parking is not intended to be proposed under this subject SSD application, updated documents including plans and the Traffic Impact Assessment should be provided to remove all reference to its use and construction as it can not be considered under this subject application.  | Consent is sought for the minor works of creating a suitable area for trucks to lay up when required, on a temporary basis. This site services SBA customers nationally and will have line haul vehicles that travel between this site and Melbourne, Brisbane and Adelaide. These drivers arrive on site at various times and often require a safe place to park during their rest breaks. The Chain of Responsibility is very clear about drivers test breaks and parking a truck in Distribution Drive would mean that they may be liable for fines etc. There are also requirements for potential truck and trailer storage over a weekend and driver changeover points based on the number of hours a driver has worked. The proposed area is expected to be used as a driveway to access future development works. |





**RESPONSE TO SUBMISSIONS REPORT**

Proposed Industrial food manufacturing facility

2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

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**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER | MATTERS RAISED                     | COMMENTS / REQUESTS  | FORMAL RESPONSE   |
|-----------|------------------------------------|--|---|
|           | Construction Materials             | Further information on the construction materials and finishes proposed to be used for the construction of the manufacturing facility including external finishes.   | Updated architectural plans form part of <b>Appendix C1</b> , with external elevations showing proposed finishes and materials.   |
|           | Construction Staging and Timeframe | Further information is required on the anticipated timeframe for each stage of the construction of the manufacturing facility including timeframes for preliminary site works, partial demolition of the existing warehouse facility, construction and internal fit out.   | A preliminary construction program forms part of <b>Appendix C7</b> of this RTS Report, with construction commencement highly dependent on the timing of development consent.   |
|           | Site Access and Manoeuvrability    | As mentioned above, the Department notes the development operations will include the delivery of products and materials such as oils and flours to the manufacturing facility.<br><br>However, the SWEPT path analysis drawings provided only demonstrate the vehicle movements of raw potato and corn material delivery to the site. The Department requests further SWEPT path analysis demonstrating the movements of all delivery vehicles to the site including the identification of distribution/delivery points on the site. | All swept path analysis – per SBA instructions – have been included in the Transport Assessment, dated 20 August 2021 (Appendix 17 of the EIS).<br><br>Furthermore, in response to the TfNSW request, Ason Group have conducted super B-Double swept paths, which are appended to their Traffic Statement contained with <b>Appendix C4</b> of this RTS Report.   |
|           |                                    | As previously mentioned, the Department notes the northern residual land is proposed to be used as temporary truck parking with a capacity of 30 heavy vehicles/trucks. The Department requests further information on the need for the temporary truck parking and it's implications on heavy vehicle movements.  | As detailed above, consent is sought for the minor works of creating a suitable area for trucks to lay up when required, on a temporary basis. This site services SBA customers nationally and will have line haul vehicles that travel between this site and Melbourne, Brisbane and Adelaide. These drivers arrive on site at various times and often require a safe place to park during their rest breaks. The Chain of Responsibility is very clear about drivers test breaks and parking a truck in Distribution Drive would mean that they may be liable for fines etc. There are also requirements for potential truck and trailer storage over a weekend and driver changeover points based on the |





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2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

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**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER              | MATTERS RAISED               | COMMENTS / REQUESTS  | FORMAL RESPONSE  |
|------------------------|------------------------------|--|--|
|                        |                              |  | <p>number of hours a driver has worked. The proposed area is expected to be used as a driveway to access future development works.</p> <p>Refer to the Transport Assessment (section 5.1.2), dated 20 August 2021 (Appendix 17 of the EIS), which confirms that the truck movements would be outside road network AM and PM peak hours as instructed by SBA.</p> <p>Trucks will typically enter the parking facility later in the evening and leave the residual area OUTSIDE road network AM peak hour.</p> |
|                        |                              | Further clarification is required that the proposed light vehicle access point is suitable for heavy vehicle access to the temporary truck parking area.   | <p>Refer to drawing AG06 of the Transport Assessment, dated 20 August 2021 (Appendix 17 of the EIS), showing B-Double simultaneous entry and exit movements for B-Doubles to/from the truck parking area.</p> <p>Furthermore, the truck parking area is separated from the light vehicle car parking facilities.</p>   |
|                        | Architectural Plans          | The EIS notes the Roof Plan provided in the Architectural Plans (Appendix 5) illustrate and colour coordinate mechanical roof plant for the development. However, it is not clearly demonstrated what the different plant and equipment are. An amended Roof Plan is required which provides a key to identify the different colour coordinated mechanical roof plant. | Updated architectural plans form part of <b>Appendix C1</b> , with the roof plan updated to demonstrate the proposed mechanical plant.   |
| <b>DPI Agriculture</b> | Biodiversity and Food Safety | <p>DPI Agriculture has no concerns with the proposed development.</p> <p>DPI Biosecurity and Food Safety has advised that the proponent should note that the NSW Food Safety Code requires food for sale to be safe and suitable for human consumption and that there is no misleading conduct. Further</p>  | Noted – no action required.  |





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| SUBMITTER  | MATTERS RAISED               | COMMENTS / REQUESTS   | FORMAL RESPONSE  |
|--|------------------------------|---|--|
|  |                              | information can be obtained at the NSW Food Authority website and the relevant food safety requirements are available here.   |  |
| <b>Environment, Energy and Science Group (EES)</b> | Flooding assessment          | EES has no comments on the flooding assessment.   | Noted – no action required.  |
|  | Biodiversity assessment      | <p>In relation to the biodiversity assessment, however, EES advises the EIS does not comply with either section 7.9 (2) of the <i>Biodiversity Conservation Act 2016</i> or the 'How to apply for a biodiversity development assessment report waiver for a Major Project Application' 2019 DPE guidelines.</p> <p>EES also notes the EIS does not comply with the Planning Secretary's Environmental Assessment Requirements issued for the proposal on 27 May 2021, which requires the EIS must include 'an assessment of the proposal's biodiversity impacts in accordance with the <i>Biodiversity Conservation Act 2016</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR) where required under the Act, except where a waiver for preparation of a BDAR has been granted'.</p> | <p>The Biodiversity Assessment Report (BAR) has been updated based on the request from EES, and resubmitted for consideration.</p> <p>It is understood that NSW DPE have provided the updated BAR to EES on 17 November 2021 for consideration of the request to waive the requirement for a BDAR.</p> |
| <b>Endeavour Energy</b>                            | Network Capacity/ Connection | Endeavour Energy has noted the EIS indicates 'The incoming power supply has been negotiated with Endeavour Energy'. Accordingly, the applicant must complete the application for connection of load with Endeavour Energy's Network Connections Branch who are responsible for managing the conditions of supply with the proponent and their Accredited Service Provider (ASP). The applicant will also need to contact Endeavour Energy's Network Connections Branch if this Development Application:   | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.  |





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| SUBMITTER | MATTERS RAISED | COMMENTS / REQUESTS  | FORMAL RESPONSE   |
|-----------|----------------|--|---|
|           |                | <ul style="list-style-type: none"> <li>Includes any contestable works projects that are outside of any existing approved / certified works.</li> <li>Results in an electricity load that is outside of any existing Supply / Connection Offer requiring the incorporation of the additional load for consideration.</li> </ul>   |   |
|           |                | <p>For the two new 11,000 volt / 11 kilovolt (kV) high voltage feeders required to facilitate the proposed development, for similar projects Endeavour Energy's Network Connections Branch has provided the following advice regarding the transmission requirements and high voltage distribution requirements:</p> <p><i>Appropriate consideration of the environmental impact when constructing a new feeder will need to be provided. The impact of these types of works in most settings are considerable, including:</i></p> <ul style="list-style-type: none"> <li><i>Network outages to facilitate the completion of the electrical works.</i></li> <li><i>Traffic diversions and disruptions to traffic flow which will require a traffic management plan.</i></li> <li><i>Establishing appropriate barriers and signage to ensure traffic and pedestrians are safely diverted around works</i></li> <li><i>Liaising with the road controlling authority to ensure works align with their strategies and requirements.</i></li> <li><i>Other typical construction impacts might include noise and vibration associated with construction equipment, and dust from the construction zone which will need to be managed to minimise these impacts.</i></li> <li><i>Notifying properties whose access and/or power supply will be affected.</i></li> </ul> | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent. |





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**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER   | MATTERS RAISED   | COMMENTS / REQUESTS  | FORMAL RESPONSE      |          |            |  |                     |                      |   |   |                                     |  |  |  |                                     |  |   |
|---|--|--|----------------------|----------|------------|--|---------------------|----------------------|---|---|-------------------------------------|--|--|--|-------------------------------------|--|---|
|   |  | <i>In saying the foregoing, it is expected that Endeavour Energy's processes and procedures will be followed when application is made for connection to Endeavour Energy's electricity supply network and these will apply to projects such as this. These procedures require the submissions of a Summary Environmental Report (SER) with each electrical design submitted to Endeavour Energy's Network Connections Branch for Certification. Endeavour Energy is a Determining Authority under Part 5 Environmental Planning and Assessment Act, 1979 (NSW) and under the auspices of the Code of Practice for Authorised Network Operators (the Code) as prepared by the then Department of Planning and Environment in 2015.</i>  |                      |          |            |  |                     |                      |   |   |                                     |  |  |  |                                     |  |   |
|   | Bushfire and Bushfire Risk Management  | <p>Endeavour Energy has noted the EIS indicates a Bushfire Protection Assessment has been undertaken having regard to the requirements of NSW Rural Fire Service 'Planning for Bush Fire Protection 2019' which provides the following advice regarding electricity services.</p> <p><b>3.4 Electricity services</b></p> <p>Table 3-4 outlines the proposed performance solution and compliance with the performance criteria for electricity services.</p> <p><small>Table 3-4 – performance criteria for electricity services (PBP guidelines pg. 68)</small></p> <table border="1"> <thead> <tr> <th rowspan="2">Performance criteria</th><th rowspan="2">Solution</th><th colspan="2">Compliance</th></tr> <tr> <th>Acceptable solution</th><th>Performance criteria</th></tr> </thead> <tbody> <tr> <td>Location of electricity services limits the possibility of ignition of surrounding bushland or the fabric of buildings.</td><td>Where practicable, electrical transmission lines are underground.</td><td><input checked="" type="checkbox"/></td><td></td></tr> <tr> <td></td><td>Where overhead electrical transmission lines are proposed: <ul style="list-style-type: none"> <li>lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and</li> <li>no part of a tree is closer to a power line than the distance set out in ISSC3 Guideline for Managing Vegetation Near Power Lines.</li> </ul> </td><td><input checked="" type="checkbox"/></td><td></td></tr> </tbody> </table> <p>Accordingly the electricity network required to service the proposed development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour Energy's</p> | Performance criteria | Solution | Compliance |  | Acceptable solution | Performance criteria | Location of electricity services limits the possibility of ignition of surrounding bushland or the fabric of buildings. | Where practicable, electrical transmission lines are underground. | <input checked="" type="checkbox"/> |  |  | Where overhead electrical transmission lines are proposed: <ul style="list-style-type: none"> <li>lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and</li> <li>no part of a tree is closer to a power line than the distance set out in ISSC3 Guideline for Managing Vegetation Near Power Lines.</li> </ul> | <input checked="" type="checkbox"/> |  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent. |
| Performance criteria  | Solution   | Compliance   |                      |          |            |  |                     |                      |   |   |                                     |  |  |  |                                     |  |   |
|   |  | Acceptable solution  | Performance criteria |          |            |  |                     |                      |   |   |                                     |  |  |  |                                     |  |   |
| Location of electricity services limits the possibility of ignition of surrounding bushland or the fabric of buildings. | Where practicable, electrical transmission lines are underground.  | <input checked="" type="checkbox"/>  |                      |          |            |  |                     |                      |   |   |                                     |  |  |  |                                     |  |   |
|   | Where overhead electrical transmission lines are proposed: <ul style="list-style-type: none"> <li>lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and</li> <li>no part of a tree is closer to a power line than the distance set out in ISSC3 Guideline for Managing Vegetation Near Power Lines.</li> </ul> | <input checked="" type="checkbox"/>  |                      |          |            |  |                     |                      |   |   |                                     |  |  |  |                                     |  |   |





**RESPONSE TO SUBMISSIONS REPORT**

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER | MATTERS RAISED  | COMMENTS / REQUESTS  | FORMAL RESPONSE  |
|-----------|---|--|--|
|           |   | risk assessment associated with the implementation and use of the network connection / infrastructure for a bushfire prone site. In assessing bushfire risk, which is a function of the condition of the network. Risk control has focused on reducing the likelihood of fire ignition by implementing good design and maintenance practices. However, the potential impact of a bushfire on its electricity infrastructure and the safety risks associated with the loss of electricity supply are also considered.   |  |
|           | State Environmental Planning Policy No 33 – Hazardous and Offensive Development (SEPP 33) | <p>Endeavour Energy is aware that the provisions of SEPP33 in the preparation of a preliminary hazard assessment electricity infrastructure is not defined / regarded as sensitive land use. However, in similar situations Endeavour Energy has sought further advice from the consultants preparing the preliminary hazard assessment on the basis that, although not a sensitive land use in the traditional / environmental sense, if the electricity infrastructure on or in proximity of the site (which also may be a potential ignition source) is damaged, the resulting outage could leave many properties / customers without power. The consultants have been requested to specifically address the risks associated with the proximity of the electricity infrastructure i.e. detail design considerations, technical or operational controls etc. to demonstrate as required by SEPP33 that the proposed business / development is suitably located and can be built and operated with an adequate level of safety and pollution control.</p> <p>Conversely, Endeavour Energy's electricity infrastructure is potentially a source of ignition for fires. Endeavour Energy's risk control has focused on reducing the likelihood of fire</p> | <p>The Preliminary Hazard Analysis (PHA), dated 29 June 2021 (Appendix 28 of the EIS), assesses the risks posed by SBA operations to adjacent land uses. The results of the PHA indicate that all risks were within the acceptable criteria established in Hazardous Industry Planning Advisory Paper No 4 - Risk Criteria for Land Use Safety Planning (HIPAP 4).</p> <p>The consequence analysis conducted in Section 5 of the PHA indicates that Endeavour Energy's infrastructure would be outside the contours for incident propagation. Furthermore, Endeavour Energy's infrastructure would not act as an ignition source, as Dangerous Goods (DGs) are separated from the site boundary and stored in accordance with the relevant Australian Standards. Therefore, no further assessment is required.</p> |





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|           |                | ignition by implementing good design and maintenance practices. However, there is still the potential for fires to occur as a result of fault currents, flashovers, fallen conductors, vehicle impacts etc. and the potential for these as a risk to hazardous and offensive development should also be considered.   |   |
|           | Earthing       | <p>The construction of any building or structure (including fencing, signage, flag poles, hoardings etc.) whether temporary or permanent that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations' as updated from time to time. This Standard sets out requirements for the design, construction and verification of electrical installations, including ensuring there is adequate connection to the earth. It applies to all electrical installations including temporary builder's supply / connections.</p> <p>Inadequate connection to the earth to allow a leaking / fault current to flow into the grounding system and be properly dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury.</p> <p>The earthing system is usually in the form of an earth electrode consisting of earth rods or mats buried in the ground. It should be designed by a suitably qualified electrical engineer / Accredited Service Provider (ASP) following a site-specific risk assessment having regard to the potential number of people could be simultaneously exposed, ground resistivity etc. For details of the ASP scheme please refer to the above point 'Network Capacity / Connection'.</p> | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent. |





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Proposed Industrial food manufacturing facility

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SSD-18204994

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|           |                                      | In particular appropriate consideration should be provided to the conductivity of the fencing within an easement or in proximity of electricity infrastructure (particularly with overhead power lines which may fall as a result of storm damage or accidental strikes) where there is a possibility it could act as a conductor of electricity and dangerous currents may be carried along the fence. Where conductive / metal fencing is used it must be appropriately earthed eg. the by the use of isolation panels where the fence enters or exits the easement created by the use of timber posts and/or earth electrode installed adjacent to the easement or overhead power lines.  |   |
|           | Easement Management / Network Access | <p>The following is a summary of the usual / main terms of Endeavour Energy's electrical easements requiring that the landowner:</p> <ul style="list-style-type: none"> <li>▪ Not install or permit to be installed any buildings, structures or services within the easement site.</li> <li>▪ Not alter the surface level of the easement site.</li> <li>▪ Not do or permit to be done anything that restricts access to the easement site without the prior written permission of Endeavour Energy and in accordance with such conditions as Endeavour Energy may reasonably impose.</li> </ul> <p>Endeavour Energy's preference is for no activities or encroachments to occur within its easements. Most activities are prohibited within the padmount substation easement. However, if any works or activities (other than those approved / certified by Endeavour Energy's Network</p> | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent. |





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2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

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|           |                   | <p>Connections Branch as part of an enquiry / application for load or asset relocation project) will encroach / affect Endeavour Energy's easements, contact must first be made with the Endeavour Energy's Easements Officer, Jeffrey Smith. Please find attached for the applicant's reference copies of Endeavour Energy's:</p> <ul style="list-style-type: none"> <li>▪ Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights' which deals with activities / encroachments within easements.</li> <li>▪ General Restrictions for Underground Cables.</li> <li>▪ Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations.</li> </ul> <p>It is imperative that the access to the existing electrical infrastructure on and in proximity of the site be maintained at all times. To ensure that supply electricity is available to the community, access to the electricity infrastructure may be required at any time. Restricted access to electricity infrastructure by electricity workers causes delays in power restoration and may have severe consequences in the event of an emergency.</p> |   |
|           | Prudent Avoidance | <p>The electricity industry has adopted a policy of prudent avoidance by doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to emissions from electricity infrastructure such as electric and magnetic fields (EMF) and noise which generally increase the higher the voltage ie. Endeavour Energy's network ranges from low voltage (normally not exceeding 1,000 volts) to high voltage (normally exceeding 1,000 volts but not exceeding 132,000 volts / 132 kV). In practical terms that when designing new transmission</p>   | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent. |





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|           |                | <p>and distribution facilities, consideration is given to reducing exposure and increasing separation distances to more sensitive uses such as residential or schools, pre-schools, day care centres or where potentially a greater number of people are regularly exposed for extended periods of time.</p> <p>These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase.</p> <p>Endeavour Energy believes that irrespective of the zoning or land use, applicants (and Council) should also adopt a policy of prudent avoidance by the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development.</p> <p>Where development is proposed near electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development.</p> <p>Please find attached a copy of Energy Networks Association's 'Electric &amp; Magnetic Fields – What We Know' which can also be accessed via their website and provides the following advice:</p> <p><i>Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source.</i></p> |                 |





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|           |                       | <p><i>The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.</i></p> <p>Typical magnetic field measurements associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt / 132 kV, will with the observance of these separation distances not exceed the recommended magnetic field public exposure limits.</p>  |  |
|           | Vegetation Management | <p>The planting of large trees near electricity infrastructure is not supported by Endeavour Energy. Particularly for overhead power lines, ongoing vegetation management / tree trimming is a significant network cost and falling trees and branches during storms are a major cause of power outages.</p> <p>Suitable planting needs to be undertaken in proximity of electricity infrastructure (including any new electricity infrastructure required to facilitate the proposed development). Only low growing shrubs not exceeding 3.0 metres in height, ground covers and small shrubs, with non-invasive root systems are the best plants to use. Larger trees should be planted well away from electricity infrastructure (at least the same distance from overhead power lines as their potential full-grown height) and even with the underground cables, be installed with a root potential full-grown height) and even with underground cables, be installed with a root barrier around the root ball of the plant.</p> <p>Landscaping that interferes with electricity infrastructure may become a potential safety risk, cause of bush fire, restrict access, reduce light levels from streetlights or result in the interruption of supply. Such landscaping may be subject to</p> | <p>There are no overhead power lines in the vicinity of proposed planting. The closest proposed tree is approximately 30m from the overhead power lines along Mamre Road.</p> <p>Tree planting adjacent to the underground cables easement will include root barriers for the full extent of the easement.</p> <p>The Landscape Plans have been updated to:</p> <ul style="list-style-type: none"><li>▪ increase the separation between the electrical easement and proposed trees;</li><li>▪ ensure that any shrub planting within the electrical easement is under 3.0m in height.</li></ul> <p>These plans form <b>Appendix C2</b> of the RTS Report.</p> |





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SSD-18204994

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|           |                     | <p>Endeavour Energy's Vegetation Management program and/or the provisions of the <i>Electricity Supply Act 1995</i> (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.</p> <p>Endeavour Energy's recommendation is that existing trees which are of low ecological significance in proximity of overhead power lines be removed and if necessary replaced by an alternative smaller planting. Any planting needs to ensure appropriate clearances are maintained whilst minimising the need for future pruning.</p> <p>Screening vegetation around a padmount substation should be planted a minimum distance of 800mm plus half of the mature canopy width from the substation easement and have shallow / non-invasive roots. This is to avoid trees growing over the easement as falling branches may damage the cubicle and the electricity infrastructure as do tree roots. All vegetation is to be maintained in such a manner that it will allow unrestricted access by electrical workers to the substation easement all times.</p> |   |
|           | Dial Before You Dig | Before commencing any underground activity, the applicant is required to obtain advice from the <i>Dial Before You Dig 1100</i> service in accordance with the requirements of the <i>Electricity Supply Act 1995</i> (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical and other utility infrastructure, but also to identify them as a hazard and to properly assess the risk.  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent. |





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SSD-18204994

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|                | Demolition           | Demolition work is to be carried out in accordance with Australian Standard AS 2601-2001: 'The demolition of structures' as updated from time to time. All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected i.e. all electrical apparatus shall be regarded as live until isolated and proved de-energised by approved means.<br><br>Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. streetlight columns, power poles, overhead power lines and underground cables etc. | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.   |
|                | Public Safety        | Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. Please find attached copies of Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why you may be at risk and what you can do to work safely.  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.   |
|                | Network Asset Design | Endeavour Energy's Company Policy 9.2.5 'Network Asset Design', includes requirements for electricity connections to new urban subdivision / development.   | Noted – no action required.   |
| <b>NSW EPA</b> | Noise and Vibration  | The EPA would like DPE to confirm what noise limits should be used for this project, in particular whether noise limits outlined under C16 of SSD-7173 for the First Estate Precinct are to be used as project specific noise limits, or whether these noise limits should be considered as the total and cumulative limit of all developments within the precinct. This information is necessary for the EPA's assessment of this proposal and its future regulation of this premises.   | As confirmed by the NSW DPE Industry Assessments team, on 24 November 2021, an agreement was reached between NSW DPE and EPA to have the NIA proceed with the original approach adopted by Renzo Tonin.<br><br>As such, the proposal does not need to consider the total and cumulative limits of all developments in the precinct. |





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|           |                | <p>Should noise limits under C16 of SSD-7173 be adopted for each separate development in the precinct, there may be a risk that cumulative impacts will adversely impact the noise amenity of the surrounding community. The EPA does not currently have sufficient information to determine if this will occur, however it is important that DPE be aware of the risk that cumulative noise impacts from all these developments could exceed the amenity criteria under the Noise Policy for Industry (NPfI).</p>   | <p>See Section 3.2 of the updated NIA, contained with <b>Appendix C5</b> of this RTS Report.</p>   |
|           |                | <p>The EPA's review of the NIA has identified a number of other issues that will need to be addressed. In particular the NIA should be updated to:</p> <ul style="list-style-type: none"> <li>▪ address DPE's advice on how the noise limits under SSD-7173 and SSD-9429 interact and apply for the current application</li> <li>▪ adequately identify and assess impacts on residential receivers on Mandalong Close and on the Old MacDonald Childcare Centre</li> <li>▪ adequately assess the impact of the proposed development against the sleep disturbance criteria</li> <li>▪ demonstrate how matters have been considered and assessed in accordance with the Noise Policy for Industry, in particular Fact Sheet C: corrections for annoying noise characteristics</li> <li>▪ provide further details on the basis of the noise modelling assumptions</li> <li>▪ ensure the noise modelling adequately reflects the proposed development.</li> </ul> <p>Further details are provided in Attachment 1. Comments on Noise Emission Assessment of Warehouse Expansion, dated 10</p> | <p>This item is extensively reviewed and discussed in the below noise and vibration responses, with an updated NIA prepared by Renzo Tonin – refer to <b>Appendix C5</b> of this RTS Report.</p> <p>Additional information provided in response to EPA queries:</p> <ul style="list-style-type: none"> <li>▪ Further assessment to both Mandalong Close and Old MacDonald Child Care centre.</li> <li>▪ Additional child care centre assessment is provided (internal and external area) – Section 4.3.1.2, 4.3.4 and Appendix G of the NIA.</li> <li>▪ Sleep disturbance typographical error and noise source location – Section 4.3.3 and Appendix F of the NIA.</li> <li>▪ Annoying characteristics – updated Section 4.3.5, also new Appendix H of the NIA.</li> <li>▪ Detail regarding modelling assumptions/inputs – Section 4.3.1.1 and Appendix F of the NIA.</li> </ul> |





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|           |                | August 2021, Renzo Tonin and Associates, version TL950-01D02 SSDA Acoustic Assessment (r1) (NIA).  |   |
|           |                | EPA recommends that DPE clarify in writing the relevance of the noise criteria under SSD-7173 and SSD- 9429 in relation to the proposed development. The NIA should be updated, in line with this advice.  | As detailed above, the NSW DPE Industry Assessments team, on 24 November 2021, confirmed that an agreement was reached between NSW DPE and EPA to have the NIA proceed with the original approach adopted by Renzo Tonin.<br><br>Notwithstanding, the NIA has been updated to clarify the existing noise requirements, and reference should be made to Section 3 of the NIA, contained with <b>Appendix C5</b> of this RTS Report.  |
|           |                | <p>EPA recommends that:</p> <ul style="list-style-type: none"> <li>the NIA be updated to adequately identify and assess impacts on residential receivers on Mandalong Close.</li> <li>the point-to-point calculation for all residential receivers on Mandalong Close are presented and assessed in the NIA so that the impacts at all receivers in this area can be reviewed. The assessment location at the residential receivers should consider the requirements of NPfl Section 2.6.</li> <li>Any potentially affected receivers not identified under SSD-7173 or SSD-9429 should be assessed in accordance with the NPfl, taking into account requirements under SSD-7173 and/or SSD-9429, as advised by DPE.</li> </ul> | <p>Noise contours address all receivers and show compliance at all locations (both Mandalong Close and 579A Mamre.</p> <p>Contours and table of receiver noise levels are included in Appendix G of the NIA, contained with <b>Appendix C5</b> of this RTS Report.</p> <p>Noise levels at key receiver locations are presented in Tables 4.5, 4.6, 4.8 of the NIA.</p> <p>Receiver C is identified in SSD 9429 as 65-73 Mandalong Close. There are a number of dwellings located along Mandalong Close, 65-73 Mandalong Close is the closest to the site.</p> <p>65-73 Mandalong Close is also the furthest from Mamre Road, and is least impacted by road traffic noise. It is reasonable to consider Receiver C as referring to all residences along the length of Mandalong Close, and not solely 65-73 Mandalong Close. If anything, those residences on Mandalong Close that are closer to Mamre</p> |





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|           |                |   | <p>Road would experience higher background noise levels. Applying the Receiver C noise goals to them will be, if anything, conservative.</p> <p>This is now addressed by a recommendation that corn and potato delivery do not occur in same 15 minute period. New noise contours have been produced, showing compliance at all locations, both at dwelling and 30m from dwelling (for the large properties).</p> <p>Key assessment locations for residences are 30m from the dwellings (as per NPfl requirement for assessment on large residential properties). This is stated in the notes below.</p> <p>Noise sensitive receivers not identified in SSD9429 have a noise exposure less than 30dB(A).</p> |
|           |                | EPA recommends that the PNTL for the external areas of the childcare centre be revised in the NIA to reflect the appropriate amenity level for passive recreation areas. The internal areas of the centre should also be assessed using a PNTL based on school classrooms from Table 2.2 of the NPfl. | <p>Noise goals to Old MacDonald Childcare Centre are presented in Table 4.5 and 4.6 of the NIA contained within <b>Appendix C5</b> of this RTS Report.</p> <p>Additional child care centre assessment is provided (internal and external area) within Section 4.3.1.2, 4.3.4 and Appendix G of the NIA. PNTL has been revised.</p>   |
|           |                | EPA recommends that the descriptor and calculations for the sleep disturbance criteria be clarified. The location of the sources associated with maximum noise level events should be provided.   | <p>Sleep disturbance typographical error and noise source location has been updated.</p> <p>Sleep disturbance assessment (noise descriptor typo and identification of location of use of airbrake) is provided within Section 4.3.3 of the NIA contained within <b>Appendix C5</b> of this RTS Report.</p>   |





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|-----------|----------------|--|--|
|           |                | EPA recommends that the NIA provides details of the assessments required under Fact Sheet C, including low frequency noise and clarifying mechanical plant, ventilation or other industrial processes that cycle on and off during the night, and assess modifying factors using the total noise emission at receivers.  | Modifying factors / annoying characteristics (Fact Sheet C) are provided within Section 4.3.5 of the NIA contained within <b>Appendix C5</b> of this RTS Report.<br><br>Also a new NIA Appendix is created as part of additional detailed analysis of tonality, intermittent and low frequency noise.  |
|           |                | EPA recommends the following: <ul style="list-style-type: none"><li>▪ A labelled map showing the location of all modelled noise sources should be included in the NIA for both Leq and Lmax sources</li><li>▪ The location, type, amount, and other relevant information regarding mechanical plant should be provided in the NIA. The sound power levels for each type of plant should be included in the source emissions inventory. Where detailed information is not known, a conceptual sound power level could be used</li><li>▪ Further information should be provided listing the sources and their location affecting noise breakout from the building (such as doors/openings), and the operational requirements for all openings/doors</li><li>▪ Truck air brakes and other potential maximum noise sources should be adequately accounted for in the Leq assessment as well as the maximum noise level assessment</li><li>▪ All external noise sources should be clearly presented and be consistent with the proposed plans, site layout and operations for the development, including truck movements, car park vehicle movements and forklift</li></ul> | The following has now been provided in the updated NIA contained within <b>Appendix C5</b> of this RTS Report: <ul style="list-style-type: none"><li>▪ Labelled map of noise sources - Appendix F of the NIA.</li><li>▪ Location of key external mechanical plant identified in Appendix F and updated Section 4.3.1.1 of the NIA. Conceptual sound power level for mechanical plant must be applied as equipment selections are not made.</li><li>▪ Noise breakout via building shell – Section 4.3.1.1 of the NIA, identifying basis for roof sound power calculation (based on internal noise level and roof/ceiling build up).</li><li>▪ Noise breakout via doors – Section 4.4 of the NIA.</li><li>▪ Appendix F of the NIA sets out location of all primary noise sources with the exception of truck circulation paths.</li><li>▪ Appendices C, D and E of the NIA present truck circulation paths.</li><li>▪ Noise contour snap shot indicates noise sources reflect the source locations set out in Appendices C, D, E and F of the NIA.</li></ul> |





**RESPONSE TO SUBMISSIONS REPORT**

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER | MATTERS RAISED | COMMENTS / REQUESTS   | FORMAL RESPONSE  |
|-----------|----------------|---|--|
|           |                | movements. The NIA should be revised to include this information.   |  |
|           |                | EPA recommends that the proponent clarifies the address for Location B.   | Location B is identified as 579A Mamre Road, being a double storey residential house located approximately 780m north of the subject site. |
|           | Air and Odour  | <p>The EPA has reviewed the EIS and the Snack Brands Australia, Air Quality &amp; Odour Impact Assessment, prepared by North Star Pty Ltd., dated 23 August 2021, (21.1083.FR2V2) (The AQIA).</p> <p>Although the AQIA has been undertaken in general accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, additional information is required to verify conclusions and results presented.</p> <p>The EPA's review of the AQIA has identified a number of issues that will need to be addressed:</p> <ul style="list-style-type: none"> <li>▪ there is uncertainty regarding the input data and assumptions made in the preparation of the AQIA assessment</li> <li>▪ the proponent must demonstrate that there are procedures in place to ensure that the equipment plant expected performance can be achieved on an ongoing basis</li> <li>▪ the efficiency of some of the proposed odour mitigation controls is unclear</li> <li>▪ the approach to assess odour impacts must be revised</li> <li>▪ the risk of odour impacts from the proposal must also be put in the context of the history of complaints at the two existing facilities and additional mitigation measures that</li> </ul> | This item is extensively reviewed and discussed in the below air and odour responses.  |





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|-----------|----------------|---|---|
|           |                | <p>can be implemented if there are odour problems once operational.</p> <p><i>Further details are provided in Attachment B. Comments on Snack Brands Australia, Air Quality &amp; Odour Impact Assessment, prepared by North Star Pty Ltd., dated 23 August 2021, (21.1083.FR2V2)</i></p>   |   |
|           |                | <p>There is uncertainty regarding the odour emission rates used in the preparation of the modelling scenario.</p> <p>The EPA recommends the AQIA be revised to include:</p> <ul style="list-style-type: none"> <li>detailed discussion to robustly and transparently demonstrate that the use of the “specification parameter data”, instead of the significantly higher measured data, for the UPC-2 is appropriate to characterise odour emissions, including those from existing equipment to be relocated to the proposed facility</li> </ul> | <p>The proposal would involve the installation of new production lines, which would be commissioned to achieve the odour specification as outlined in Figure 8 of the AQIA report (<b>Appendix C6</b> of this RTS Report). Consequently, the appropriate emission rates are the “specification parameter data” rather than the measured emission rates on old production lines. It is anticipated that those data would also be the basis of emission limit values in the Environmental Protection License (EPL).</p> |
|           |                | <ul style="list-style-type: none"> <li>detailed discussion to explain why the UPC-2 “specification parameter data” was chosen over the PC-42 fryer data</li> </ul>  | <p>UPC-2 data has been used, where advised by SBA, that it is representative of the various emission points (sources 1-3, 8-11). None of the proposed emissions are equivalent to PC-42 and that data has not been used.</p>  |
|           |                | <ul style="list-style-type: none"> <li>the manufacturers specification parameter data or performance guarantee for the UPC-2 and PC-42 fryers</li> </ul>  | <p>The documentation is generated by the Original Equipment supplier, Heat and Control, who design, manufacture, and support the ongoing operation of this equipment.</p> <p>Excerpts from the technical specification for PC-42 and UPC-2 are presented below:</p>   |







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| SUBMITTER   | MATTERS RAISED                 | COMMENTS / REQUESTS | FORMAL RESPONSE  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
|---|--------------------------------|---------------------|--|--|--|--|--|--|--|-------|-------|-------|------|-----|-----|------|-----|-----|----|------|-------|------|------|----|--|--|--|--|---------|------|-------|------|------|--------------|------|--------|------|-------|-------|-------|--------|-------|-------|-------------|--|-------|--|--|-----------|--|--------|--|--|---|--|--|-------|--|-------------------------|-------------|--|----------|--|----------------------------|-----------|--|----------|--|-------|------------------------------|--|---------------|--|---------------------------|--|--|--|--|--|-------|-------|-------|------|-----|-------|-------|-------|-------|----|--------|-------|--------|--------|----|--|--|--|--|---------|--------|-------|--------|--------|-----------|--------|--------|--------|--------|-------|--------|--------|--------|---------|-------------|--|-------|--|--|-----------|--|--------|--|--|--|--|--|-------|--|-------------------------|-------------|--|----------|--|----------------------------|-----------|--|-----------|--|-------|--------------------------------|--|----------------|--|--|--|--|--|--|
|   |                                |                     | <div><div></div><div>Technical Specification</div></div> <div><div>KHX PC42</div><div>Issued 18/2/2020 by Mick Walsh</div></div> <div>For a KHX operating a PC-42 fryer at approximately 2000 kg/hr of finished product, the emissions are calculated as follows:</div> <div><table><tr><th colspan="5">EXHAUST GASES (after KHX - by calculation)</th></tr><tr><th></th><th>kg/hr</th><th>kJ/kg</th><th>Nm3/h</th><th>m3/h</th></tr><tr><td>CO2</td><td>910</td><td>92.4</td><td>463</td><td>663</td></tr><tr><td>N2</td><td>4279</td><td>107.4</td><td>3423</td><td>5049</td></tr><tr><td>O2</td><td></td><td></td><td></td><td></td></tr><tr><td>Dry Air</td><td>3362</td><td>104.2</td><td>2591</td><td>3821</td></tr><tr><td>H2O (vapour)</td><td>5997</td><td>2632.0</td><td>7461</td><td>11004</td></tr><tr><td>Total</td><td>14548</td><td>2936.2</td><td>13938</td><td>20557</td></tr><tr><td>Temperature</td><td></td><td>150°C</td><td></td><td></td></tr><tr><td>Dew Point</td><td></td><td>83.9°C</td><td></td><td></td></tr><tr><td colspan="3">Exhaust has the following measured characteristics:</td><td colspan="2">Total</td></tr><tr><td>Total VOC (as n-Hexane)</td><td colspan="2">&lt;0.7 mg/Nm3</td><td colspan="2">&lt;10 g/hr</td></tr><tr><td>Particulate matter (Total)</td><td colspan="2">&lt;3 mg/Nm3</td><td colspan="2">&lt;42 g/hr</td></tr><tr><td>Odour</td><td colspan="2">200 ou/Nm3 - Chlorine/greasy</td><td colspan="2">774 ou.m3/sec</td></tr></table></div> <div>== End of Document ==</div> <div><div></div><div>11501287 SBA UPC #2<br/>Thermal Fluid KHX Emissions</div></div> <div><table><tr><th colspan="5">EXHAUST GASES (after CAP)</th></tr><tr><th></th><th>kg/hr</th><th>kJ/kg</th><th>Nm3/h</th><th>m3/h</th></tr><tr><td>CO2</td><td>457.0</td><td>132.6</td><td>232.7</td><td>377.8</td></tr><tr><td>N2</td><td>2148.8</td><td>151.5</td><td>1719.3</td><td>2791.1</td></tr><tr><td>O2</td><td></td><td></td><td></td><td></td></tr><tr><td>Dry Air</td><td>1467.5</td><td>147.0</td><td>1130.7</td><td>1835.6</td></tr><tr><td>H2O (vap)</td><td>2846.3</td><td>2712.3</td><td>3541.3</td><td>5749.0</td></tr><tr><td>Total</td><td>6919.6</td><td>1202.7</td><td>6624.0</td><td>10753.5</td></tr><tr><td>Temperature</td><td></td><td>170°C</td><td></td><td></td></tr><tr><td>Dew Point</td><td></td><td>83.1°C</td><td></td><td></td></tr><tr><td colspan="3">Exhaust has following measured characteristics</td><td colspan="2">Total</td></tr><tr><td>Total VOC (as n-Hexane)</td><td colspan="2">&lt; 0.7 mg/m³</td><td colspan="2">&lt; 5 g/hr</td></tr><tr><td>Particulate matter (total)</td><td colspan="2">&lt; 3 mg/m³</td><td colspan="2">&lt; 20 g/hr</td></tr><tr><td>Odour</td><td colspan="2">200 ou/m3 - Greasy/cooking fat</td><td colspan="2">22,000 ouv/min</td></tr><tr><td colspan="5">This is a 95% reduction from non-KHX installation.</td></tr></table></div> | EXHAUST GASES (after KHX - by calculation) |  |  |  |  |  | kg/hr | kJ/kg | Nm3/h | m3/h | CO2 | 910 | 92.4 | 463 | 663 | N2 | 4279 | 107.4 | 3423 | 5049 | O2 |  |  |  |  | Dry Air | 3362 | 104.2 | 2591 | 3821 | H2O (vapour) | 5997 | 2632.0 | 7461 | 11004 | Total | 14548 | 2936.2 | 13938 | 20557 | Temperature |  | 150°C |  |  | Dew Point |  | 83.9°C |  |  | Exhaust has the following measured characteristics: |  |  | Total |  | Total VOC (as n-Hexane) | <0.7 mg/Nm3 |  | <10 g/hr |  | Particulate matter (Total) | <3 mg/Nm3 |  | <42 g/hr |  | Odour | 200 ou/Nm3 - Chlorine/greasy |  | 774 ou.m3/sec |  | EXHAUST GASES (after CAP) |  |  |  |  |  | kg/hr | kJ/kg | Nm3/h | m3/h | CO2 | 457.0 | 132.6 | 232.7 | 377.8 | N2 | 2148.8 | 151.5 | 1719.3 | 2791.1 | O2 |  |  |  |  | Dry Air | 1467.5 | 147.0 | 1130.7 | 1835.6 | H2O (vap) | 2846.3 | 2712.3 | 3541.3 | 5749.0 | Total | 6919.6 | 1202.7 | 6624.0 | 10753.5 | Temperature |  | 170°C |  |  | Dew Point |  | 83.1°C |  |  | Exhaust has following measured characteristics |  |  | Total |  | Total VOC (as n-Hexane) | < 0.7 mg/m³ |  | < 5 g/hr |  | Particulate matter (total) | < 3 mg/m³ |  | < 20 g/hr |  | Odour | 200 ou/m3 - Greasy/cooking fat |  | 22,000 ouv/min |  | This is a 95% reduction from non-KHX installation. |  |  |  |  |
| EXHAUST GASES (after KHX - by calculation)          |                                |                     |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
|   | kg/hr                          | kJ/kg               | Nm3/h  | m3/h                                       |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| CO2   | 910                            | 92.4                | 463  | 663  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| N2  | 4279                           | 107.4               | 3423   | 5049                                       |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| O2  |                                |                     |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Dry Air   | 3362                           | 104.2               | 2591   | 3821                                       |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| H2O (vapour)  | 5997                           | 2632.0              | 7461   | 11004                                      |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Total   | 14548                          | 2936.2              | 13938  | 20557                                      |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Temperature   |                                | 150°C               |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Dew Point   |                                | 83.9°C              |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Exhaust has the following measured characteristics: |                                |                     | Total  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Total VOC (as n-Hexane)                             | <0.7 mg/Nm3                    |                     | <10 g/hr   |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Particulate matter (Total)                          | <3 mg/Nm3                      |                     | <42 g/hr   |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Odour   | 200 ou/Nm3 - Chlorine/greasy   |                     | 774 ou.m3/sec  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| EXHAUST GASES (after CAP)                           |                                |                     |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
|   | kg/hr                          | kJ/kg               | Nm3/h  | m3/h                                       |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| CO2   | 457.0                          | 132.6               | 232.7  | 377.8                                      |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| N2  | 2148.8                         | 151.5               | 1719.3   | 2791.1                                     |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| O2  |                                |                     |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Dry Air   | 1467.5                         | 147.0               | 1130.7   | 1835.6                                     |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| H2O (vap)   | 2846.3                         | 2712.3              | 3541.3   | 5749.0                                     |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Total   | 6919.6                         | 1202.7              | 6624.0   | 10753.5                                    |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Temperature   |                                | 170°C               |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Dew Point   |                                | 83.1°C              |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Exhaust has following measured characteristics      |                                |                     | Total  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Total VOC (as n-Hexane)                             | < 0.7 mg/m³                    |                     | < 5 g/hr   |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Particulate matter (total)                          | < 3 mg/m³                      |                     | < 20 g/hr  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| Odour   | 200 ou/m3 - Greasy/cooking fat |                     | 22,000 ouv/min   |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |
| This is a 95% reduction from non-KHX installation.  |                                |                     |  |  |  |  |  |  |  |       |       |       |      |     |     |      |     |     |    |      |       |      |      |    |  |  |  |  |         |      |       |      |      |              |      |        |      |       |       |       |        |       |       |             |  |       |  |  |           |  |        |  |  |   |  |  |       |  |                         |             |  |          |  |                            |           |  |          |  |       |                              |  |               |  |                           |  |  |  |  |  |       |       |       |      |     |       |       |       |       |    |        |       |        |        |    |  |  |  |  |         |        |       |        |        |           |        |        |        |        |       |        |        |        |         |             |  |       |  |  |           |  |        |  |  |  |  |  |       |  |                         |             |  |          |  |                            |           |  |           |  |       |                                |  |                |  |  |  |  |  |  |





## RESPONSE TO SUBMISSIONS REPORT

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER | MATTERS RAISED | COMMENTS / REQUESTS  | FORMAL RESPONSE  |
|-----------|----------------|--|--|
|           |                | <ul style="list-style-type: none"> <li>detailed analysis to demonstrate that the adopted emission rates are representative of the proposed scale of operations and operating ranges (i.e. operating rates)</li> </ul>  | The proposal will involve the installation of new and relocated production lines, as outlined in Table 9 of the AQIA ( <b>Appendix C6</b> of this RTS Report). The new and relocated production lines will be installed and commissioned to achieve (as a minimum) the odour specification performance requirements as outlined in Figure 8 of the AQIA report. On this basis, there is no scaling adjustments to be applied to those performance guarantees (the “specification parameter data”).   |
|           |                | <ul style="list-style-type: none"> <li>a modelling scenario representative of worst-case odour emissions.</li> </ul>   | The “specification parameter data” represents the upper limit of odour emissions from the respective lines, and therefore is already representative of worst-case emissions.   |
|           |                | <p>Monitoring results presented in the AQIA indicate that additional measures may be required to ensure that the equipment plant expected performance is achieved on an ongoing basis.</p> <p>The EPA recommends the proponent provides a summary of clear metrics (e.g. triggering levels, indicators), routine monitoring and/or surrogate monitoring that the proponent will use to inform the operations and demonstrate that the plant equipment is being maintained and operated in a proper and efficient manner, including achieving the expected equipment plant performance on an ongoing basis.</p> | <p>Section 8.3 of the AQIA (<b>Appendix C6</b> of this RTS Report) provides recommendations for air quality / odour management, including recommendations for an emissions monitoring program to measure odour from the commercial kitchen processes, WWTP and OCU, and NO<sub>x</sub> on the two boilers. Section 8.3.2 additionally provides further recommendations for an OEMP, daily odour observations, an odour complaint procedure and a no idling policy.</p> <p>SBA confirm that they will accept and implement the recommendations as outlined in the AQIA for monitoring of performance.</p> |
|           |                | <p>The efficiency of some of the proposed odour mitigation controls is unclear.</p> <p>The EPA recommends the proponent:</p>   | Odour control has been estimated by comparison of the unabated and abated UPC testing. The odour control technology is comparable to that represented by the testing.  |





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**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

| SUBMITTER   | MATTERS RAISED   | COMMENTS / REQUESTS  | FORMAL RESPONSE  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
|---|--|--|--|------------------------------|-----------------|------------------------------|-----------------|--------------|--|--|--|--------------------------|-----|---------|-----|---------------|-----|--------|-----|--------------|--|--|--|--------------------------|------|---------|-----|---------------|------|--------|-----|
|   |  | <ul style="list-style-type: none"><li>Confirms whether the odour emission testing results are representative of the implementation of the proposed control equipment</li></ul> |  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
|   |  | <ul style="list-style-type: none"><li>Provides additional information regarding the expected efficiency of the nominated odour control equipment</li></ul>                     | <p>The proposal would involve the installation of new production lines which would be commissioned to achieve the odour specification as outlined in Figure 8 of the AQIA report (<b>Appendix C6</b> of this RTS Report).</p> <table><tr><th>Data source</th><th>Velocity (m/s)</th><th>Odour emission rate (OU/min)</th><th>Temperature (C)</th></tr><tr><td colspan="4"><b>PC-42</b></td></tr><tr><td>Average of sampling data</td><td>6.3</td><td>194,328</td><td>135</td></tr><tr><td>Specification</td><td>6.1</td><td>46,440</td><td>150</td></tr><tr><td colspan="4"><b>UPC-2</b></td></tr><tr><td>Average of sampling data</td><td>13.9</td><td>110,780</td><td>158</td></tr><tr><td>Specification</td><td>13.5</td><td>22,000</td><td>170</td></tr></table> | Data source                  | Velocity (m/s)  | Odour emission rate (OU/min) | Temperature (C) | <b>PC-42</b> |  |  |  | Average of sampling data | 6.3 | 194,328 | 135 | Specification | 6.1 | 46,440 | 150 | <b>UPC-2</b> |  |  |  | Average of sampling data | 13.9 | 110,780 | 158 | Specification | 13.5 | 22,000 | 170 |
|   |  | Data source  | Velocity (m/s)   | Odour emission rate (OU/min) | Temperature (C) |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
|   |  | <b>PC-42</b>   |  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| Average of sampling data  | 6.3  | 194,328  | 135  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| Specification   | 6.1  | 46,440   | 150  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| <b>UPC-2</b>  |  |  |  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| Average of sampling data  | 13.9   | 110,780  | 158  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| Specification   | 13.5   | 22,000   | 170  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| <ul style="list-style-type: none"><li>Confirms whether engineering controls for all the identified odour sources have been evaluated and considered.</li></ul>  | <p>SBA confirms that on all new equipment there are pollution controls such as after burning burners and the like which have been confirmed in the AQIA report (<b>Appendix C6</b> of this RTS Report).</p>  |  |  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |
| <p>The assessment of the odour risk due to the proposal must also be informed by the history of complaints from the two-existing facilities and the identification of additional mitigation measures.</p> <p>An assessment of odour risk involves putting the impact assessment result into context through the consideration of additional information. This additional information may include but is not necessarily limited to:</p> <ul style="list-style-type: none"><li>A detailed analysis of the history and nature of odour complaints at the two existing facilities received by the Licensee and the corresponding Appropriate Regulatory Authority.</li></ul> | <p>Section 8.2 of the AQIA (<b>Appendix C6</b> of this RTS Report) states: “It is noted that between July 2014 to September 2020, the Blacktown facility received only three odour complaints over that 6-year period and investigation of these complaints found that only one may have been directly associated with the facility”.</p> <p>As such, SBA only have evidence of one (1) complaint, with nothing else reported in their system (CARE, Myosh, Sharepoint). <b>Appendix C7</b> of this RTS Report contains a copy of SBA’s response to Council’s complaint notice.</p> <p>It is therefore considered that the risk of off-site offensive odour is unlikely, however a range of odour monitoring</p> |  |  |                              |                 |                              |                 |              |  |  |  |                          |     |         |     |               |     |        |     |              |  |  |  |                          |      |         |     |               |      |        |     |





## RESPONSE TO SUBMISSIONS REPORT

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

**TABLE 1: RESPONSE TO AGENCY SUBMISSIONS**

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|           |                |  | and management measures are proposed in Section 8.3 of the AQIA.   |
|           |                | <ul style="list-style-type: none"> <li>Discussion regarding the expected odour character and its potential offensiveness</li> </ul>                                      | <p>The expected odour character from the proposed cooking processes is likely to have wide ranging character, driven by the flavourings being used.</p> <p>In terms of its offensiveness, this may vary from mildly pleasant to mildly unpleasant (values expressed in Dravnieks on a scale from -4 [highly unpleasant] to +4 [highly pleasant])</p> <ul style="list-style-type: none"> <li>fried chicken (+2.53)</li> <li>seasoning (for meat) (+1.27)</li> <li>oily, fatty (-1.41)</li> <li>burnt, smoky (-1.53)</li> </ul>                |
|           |                | <ul style="list-style-type: none"> <li>Worst case emissions dispersion modelling scenario</li> </ul>   | As stated above, the specification parameter data represents the upper limit of odour emissions from the respective lines, and therefore is already representative of worst-case emissions.  |
|           |                | <ul style="list-style-type: none"> <li>The identification of additional mitigation measures that can be implemented if odour problems occur once operational.</li> </ul> | <p>Section 8.3.2 of the AQIA (<b>Appendix C6</b> of this RTS Report) includes a range of additional odour mitigation measures, including:</p> <ul style="list-style-type: none"> <li>the implementation of an OEMP;</li> <li>daily odour observations; and</li> <li>odour complaint procedures.</li> </ul> <p>The principal driver for operational control will be the Operational Environmental Management Plan (OEMP) which would contain a range of daily actions for odour prevention (including maintenance and daily observation),</p> |





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|           |                |   | actions and measures to be taken upon receipt of an odour complaint, and an escalation procedure.   |
|           |                | <ul style="list-style-type: none"><li>Dispersion modelling demonstrating the reduction in odour impacts with the implementation of the additional feasible mitigation measures.</li></ul>   | <p>The review of complaints history from the existing operational sites does not identify a significant risk of odour complaints.</p> <p>The AQIA (<b>Appendix C6</b> of this RTS Report) already demonstrates that additional odour controls are not required.</p> <p>It is considered that further modelling would not assist further in this regard and focus on proactive odour management through a robust OEMP would provide the most effective mechanism to control odour risk.</p>  |
|           |                | The EPA recommends the proponent must evaluate the odour risk level of their project. The evaluation of odour risk must, as a minimum, consider the examples listed above. This information is important as it will demonstrate to the EPA the proponents' level of understanding regarding the odour risk of their facility and their obligation to comply with Section 129 of the POEO Act. | <p>The initial report prepared in support of the EIS was an air quality and odour risk assessment report, which presents a dispersion modelling assessment that supersedes a risk assessment approach. Air quality risk assessments are performed where there is a lack of suitable emissions data, or the potential impacts do not warrant a modelling assessment. In this situation a modelling assessment has been used to identify where additional controls may be required, and as such risk assessment would not provide further evidence to identify where further controls are warranted.</p> <p>SBA has an Environmental and Sustainability Policy ESN-001P that outlines commitment to Environmental compliance, which is included in <b>Appendix C8</b> of this RTS Report. SBA will accept and implement the recommendations as outlined in the Air Quality &amp; Odour Impact Assessment for monitoring of performance.</p> |





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|           |                | <p>The approach to assess odour impacts at the identified receptors must be revised.</p> <p>The EPA recommends the AQIA be revised to:</p> <ul style="list-style-type: none"><li>Adopt an odour criterion of 2 OU</li></ul> | <p>The justification presented in section 3.1.2 of the AQIA (<b>Appendix C6</b> of this RTS Report) regarding the derivation of two odour impact criteria is considered appropriate. It is not considered valid to apply a 2 OU criterion at land zoned for industrial use as this:</p> <ul style="list-style-type: none"><li>(i) represents a level of amenity that would be expected at the most sensitive locations,</li><li>(ii) would negate the reasoning for zoning land for different uses and applying buffer distances to protect amenity at sensitive locations.</li></ul> <p>The application of a 2 OU criterion would essentially represent a “no odour” standard on industrial land, which is not considered reasonable or reflective of the level of amenity that would be reasonably expected on land zoned for industrial use and therefore inconsistent with definition of offensive odour under the POEO Act.</p> |
|           |                | <ul style="list-style-type: none"><li>Present segregated odour results for the Fire and Rescue NSW Emergency training.</li></ul>  | <p>Section 4.1.2 and Table 7 of the AQIA (<b>Appendix C6</b> of this RTS Report) identifies a range of receptor locations, and as stated, is “<i>not intended to represent a definitive list of sensitive land uses</i>”.</p> <p>With reference to Figure 10 in the AQIA, it can be seen that the FRNSW facility is outside of the predicted 2 OU isopleth and is therefore not considered to be unreasonably impacted irrespective of the criterion adopted.</p>  |





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|              | Water           | <p>The EPA has reviewed the EIS and notes that potentially contaminated water will be processed through the onsite Wastewater Treatment Plant before discharge to the sewer system via a Trade Waste agreement. The EIS identifies that no discharge point will be required, and that the facility is to be designed so that site stormwater will be managed at an off-site, downstream detention basin. The EPA would like to remind Snack Brands Australia that the facility should be designed so that any contaminants are contained by bunding.</p> <p>The EPA will be putting the following conditions on the licence to ensure this happens:</p> <ul style="list-style-type: none"> <li>▪ Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997</li> </ul> <p>The licensee must store all chemicals, fuels and oils used on site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards.</p> | <p>Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.</p>   |
| <b>FRNSW</b> | Recommendations | <p>Consideration be given as to whether the quantity of materials stored in the warehouse would be deemed a special hazard in regard to parts E1.10 and E2.3 of the NCC.</p>   | <p>An E1.10 / E2.3 assessment looks at special hazards posed by DGs and whether the available fire protection adequately manages this, which is not the purpose of the PHA.</p> <p>Based upon the potential for combustible dusts to be stored and handled at the site, in addition to the presence of other DGs, the E1.10/E2.3 would apply to the site.</p> <p>It is expected a Fire Safety Study per the Hazardous Industry Planning Advisory Paper No. 2 would be required for this facility, which would address Clause E1.10/E2.3.</p> |





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|             |                 | Consultation with FRNSW be undertaken by way of the Fire Engineering Brief Questionnaire (FEBQ) process prior to the issue of the relevant construction certificate.  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.   |
|             |                 | Consideration be given to FRNSW access and intervention within the warehouse, particularly at heights above ground level or at heights beyond the reach of the equipment carried by the FRNSW for internal intervention. Suitable provisions should be made due to the nature in which the materials are stored within the automated portion pursuant to part E1.10 of the NCC such that there is access provided to all parts of the racking system in compliance with the Work Health and Safety provisions. FRNSW does not consider access via roof hatches etc. to be adequate to enable sufficient access to all areas of an automated system. | High bay automated racking is part of the existing facility (SSD-9429) and is therefore not part of the new works.<br><br>Note that FRNSW provided comments provided in response FEBQs were considered in the existing FER.<br><br>Access to the mezzanine levels in the proposed extension will be provided in accordance with NCC DTS provisions.   |
|             |                 | Consideration be given to provision of adequate hydrant and hose reel coverage to all areas of the warehouse with details provided in the FEBQ/FER. Should it be deemed necessary to install additional hydrants internally within the warehouse, FRNSW will need to be consulted as to the proposed locations before support is provided.  | Internal fire hydrants are proposed, which is consistent with the existing building. FRNSW will be provided fire services drawings for review with the FEBQ submission.<br><br>A Performance Solution is proposed to omit fire hose reel coverage from inaccessible manufacturing areas, and manufacturing rooms which are fire-separated or contain oil cookers. Additional fire extinguisher/s must be provided to the shortfall areas. This Performance Solution is included in the FEBQ and will be submitted to FRNSW. |
| <b>HNSW</b> | Recommendations | HNSW has reviewed the available supporting documentation prepared for the proposal including the Environmental Impact Statement (EIS) – Proposed Industrial Food Manufacturing Facility, dated 24 August 2021 and prepared by Willowtree Planning Pty Ltd. This report recommends that a stop work procedure be developed in the event that unexpected finds  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.   |





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SSD-18204994

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|                             |                         | <p>including Aboriginal objects and/or human remains are encountered during development works.</p> <p>HNSW supports the preparation and implementation of an unexpected finds protocol for managing and mitigating any such newly identified Aboriginal objects and/or human remains in the proposal area, as recommended in the EIS.</p> <p>It is recommended that a Condition of Consent be created to ensure an unexpected finds protocol is developed for the SSD proposal.</p>   |   |
| <b>Penrith City Council</b> | Planning Considerations | <p>Consideration should be given to a staged development where the temporary turning head / formalised turning head is removed upon construction of the Distribution Drive extension and a driveway installed to maximise available landscaping opportunities in the road setback zone. At present, the turning head compromises available planning which is unlikely required when Distribution Drive is extended.</p>   | <p>SBA propose to review the turning head entry once the Distribution Drive extension is completed. It is noted that the turning head in its current form is documented as an easement. It may be a benefit to the entire precinct to leave the additional turning space, however SBA will adhere to any requirements to extend their current driveway should this be required.</p>   |
|                             |                         | <p>The landscape plans depict tree planting within the car park however the trees should be offset / staggered across both sides of the aisle to maximise canopy cover and shading opportunities in accordance with Council's Cooling the City Strategy. The current tree planting arrangement in the car park will not sufficiently assist to ameliorate the abundance of exposed hard stand parking on the site. The same offset principle should also be applied between the single trees in the parking area and the trees within the landscape strip between the parking area and the hardstand extension opposite the proposed compactors area. With the exception of one location, the trees are planted adjacent to each other which is a poor arrangement.</p> | <p>Landscape Plans have been updated to:</p> <ul style="list-style-type: none"> <li>offset trees across the parking aisle;</li> <li>amend tree pits to 3.4m wide; and</li> <li>incorporate structural tree soils to increase the available area under parking for root growth.</li> </ul> <p>These plans form <b>Appendix C2</b> of this RTS Report.</p> <p>As the site has been classified as an inner protection area (IPA) within the Bushfire Protection Assessment (Appendix 13 of the EIS), tree planting responds to the Rural Fire Service (RFS) <i>Planning for Bushfire Guidelines</i> to ensure that separations of 2-5m between mature canopies can be achieved. Therefore, due to these requirements</p> |





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|           |                | The landscape strips for tree planting in the car park are also inadequate in size and dimension. A minimum of 2m width (if not greater) is required whereas the landscape design plan suggest only 1.0m (or less) is provided. This inadequate to achieve the canopy coverage required to meet the objectives of the car park tree planting requirements. This will necessitate further reduction in car parking to address these requirements. The resulting car parking numbers achievable would need to be reconsidered against the projected demand within the Traffic and Parking Assessment and if there is a shortage, redesign to accommodate the required parking would be expected. | and the width of the available landscaping, trees are required to be planted in a row. The exception to this is on the bund, where staggered tree canopies are likely to touch, however shrubs are not placed under these areas and located some distance from the building.<br><br>This landscaping approach was approved by Travers Bushfire and Ecology, within their assessment of Geoscapes landscaping plans.   |
|           |                | Advertising Signage wasn't apparent on the elevation / photomontage drawings submitted. It is requested that any intended signage be detailed on the plans and its proportions and intent is considered in the assessment of the application   | Proposed signage zones have been updated and shown on the updated architectural plans contained within <b>Appendix C1</b> of this RTS Report. This will be subject to approval.<br><br>A full assessment of the proposed signage is included within <b>Section 4.3.2</b> of this RTS Report.  |
|           | Local Flooding | It is acknowledged that the site is not affected by mainstream flooding from South Creek in a 1% AEP flood event. The development site adjoins a stormwater channel, contained within the drainage easement (D), that was constructed as part of the parent subdivision works. Details of the stormwater flows within the channel were not provided with the application. The development must ensure that floor level of any warehouse structure is located at least 0.5m above the top water level of the 1% AEP flow within the stormwater channel contained within the drainage easement (D).  | The adjoining stormwater channel was designed by Costin Roe Consulting and formed part of the estate subdivision works.<br><br>The proposed building finished floor levels (FFLs) are at or higher than the proposed pad levels that formed the subdivision design. The previous documentation by Costin Roe clarifies that the overland flow swale has the capacity to convey the 1:100yr ARI flows, citing a peak 100yr flow of 2.82m <sup>3</sup> /s (there is a 9.5ha upstream catchment). Since the proposal does not make any adjustments to this swale (and the proposed building FFL is significantly higher than |





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|           |                          |   | the original pad FFL that formed the subdivision design) it is expected that the FFL has more than sufficient freeboard. At the most upstream (and conservative) section adjacent to the proposed building the proposal has a building FFL of 36.75, and a swale invert of 33.68. This gives a 3.07m clearance from FFL to the invert of the swale. Taking a very conservative approach and assuming a total flow depth of 1.0m – the top of water level would be 34.68 – giving a total freeboard of 2.07m. |
|           | Perimeter Fencing        | The lot is burdened by a variable width drainage easement (D) that contains a stormwater channel to convey upstream stormwater flows around the development site. A 2.1m high palisade perimeter fence is proposed across a stormwater channel at the north-east corner of the lot (adjoining Lot 12 DP 271141) which may impede flows. The fence must be designed to accommodate the stormwater flows contained within the channel up to the 1% AEP local flood event. Any fencing proposed in this location must not have any adverse impacts upon adjoining properties by way of the concentration, diversion, damming or blocking of stormwater flows within the channel. | The fence through the drainage easement is an existing fence that is proposed to remain. The proposal does not seek to make any changes to this existing fence, therefore investigation of the flood impact is not required.   |
|           | Filling of Land          | A Construction Traffic Management Plan will be required to be submitted detailing expected truck movements for the importation of fill onto the site. An Infrastructure Restoration Bond will be required to be submitted to Penrith City Council to cover any damage to Council assets during the construction phase.  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.  |
|           | Environmental Management | With respect to the Environmental Site Assessment prepared by JBS&G dated 20/4/2021, an unexpected finds protocol is recommended to be prepared prior to issue of Construction  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.  |





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|           |                | Certificate and should be addressed via conditions of consent.   |   |
|           |                | With respect to the Noise Emission Assessment prepared by Renzo Tonin and Associates dated 10/8/2021, the recommendations within the report must be addressed via conditions of consent and adhered to.  | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.   |
|           |                | With respect to the Air Quality and Odour Impact Assessment prepared by Northstar Air Quality dated 23/8/2022, the assessment does not appear to have considered the child care centre located to the north of the subject site. This development is a sensitive receiver and it is considered appropriate that this assessment address potential impacts of construction activities and on going use with respect to this land use. | <p>The omission of the childcare centre at 21A Mandalong Close in the AQIA was unintentional, and the construction dust assessment has been revisited to understand the implications of that additional sensitive receptor location.</p> <p>As illustrated in Table 16 of the AQIA (<b>Appendix C6</b> of this RTS Report), the sensitivity of land to human health impacts is assessed as 'high', and therefore the assessment would not change with the inclusion of the childcare centre.</p> <p>The sensitivity to dust soiling was assessed as 'low' and this has been reviewed.</p> <p>The childcare centre is estimated to be 250 m from the subject site, and as shown in Appendix C of the AQIA, a 'high' land use value of 10-100 receptors at 250 m would be assessed as 'low'.</p> <p>Correspondingly the conclusions of the report are unchanged with the inclusion of the childcare centre.</p> |
|           | Biodiversity   | The application includes a Biodiversity Assessment Report prepared by Travers Bushfire & Ecology dated 30 June 2021. The report has been prepared for the purposes of a BDAR waiver in relation to the State Significance Development. For the BDAR waiver to be supported, the  | Noted – no action required.   |





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|           |                | <p>consent authority must be satisfied that the proposed development is not likely to have any significant impact on biodiversity values. Two of these considerations is vegetation integrity and habitat suitability. The report states that all the existing vegetation is derived and highly disturbed and there is marginal habitat for one threatened species the Green and Golden Bell Frog. The assessment has concluded that 'the vast majority of the vegetation present is exotic and there are a few native species present, it is not considered that vegetation on site provides sufficient vegetation integrity to warrant detailed assessment.'</p> <p>However, it is noted that no floristic plots or qualitative analysis was undertaken to determine of whether the integrity score would have been high enough to warrant further assessment. In saying this the site is subject to current earthworks and validation of this is unlikely except for the artificial drainage that exists along the northern and western boundary of the site.</p> <p>The report has concluded that there will not be a significant impact on the Green and Golden Bell Frog as:</p> <ul style="list-style-type: none"><li>▪ The study area does not likely support GGBF breeding and shelter habitat in the absence of use of other localised habitat areas used for core breeding;</li><li>▪ The study area is now surrounded by recently constructed industrial development providing a barrier to the other potential breeding location</li><li>▪ The other local breeding opportunities that do exist are not likely to support core habitat for a local population;</li></ul> |                 |





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|           |                | <ul style="list-style-type: none"> <li>There are no local or recent records to suggest that a population persists in the locality.</li> </ul> <p>It is therefore concluded that the study area is not of any likely importance or use to GGBF and a viable local population is not likely present to warrant any further survey or assessment.</p> <p>As a result the conclusions outlined within the report are supported and no concerns or objections are raised to the waiver request. it is however recommended that an unexpected finds protocol is developed in respect to the Green and Golden Bell Frog, reptiles and mammals and the humane treatment of exotic species by a qualified and experienced Ecologist.</p>  |  |
|           | Waterways      | <p>The proposed development will include a satisfactory stormwater management cycle which includes a Water Sensitive Urban Design (WSUD) strategy which achieves the relevant stormwater and pollution reduction targets across the site. Rainwater harvesting would also be applied across the site (where considered practical), which will incorporate re-use in irrigation methods and recycled potable water components, i.e. toilet flushing, roof wetting and irrigation. The applicant stormwater report states that both a 50kl and a 40kl rainwater tank are to be provided with a non-potable reuse demand of %80.37. The above comments above indicates compliance with Penrith Council's WSUD strategy. However, an electronic MUISIC model in sqz format should be made available to support the application as two different sizes of rain tank have been provided.</p> | <p>The MUSIC model is provided as part of this RTS package. The tank size has been modelled as a 40kL tank within the MUSIC software, however Henry &amp; Hymas have proposed a 50kL tank to be installed. The 20% increase is to account for the following factors which is not taken into account in the MUSIC model:</p> <ul style="list-style-type: none"> <li>Anaerobic zone</li> <li>Mains water top up levels</li> <li>Overflow levels</li> </ul> |





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|           | Landscape Design | <u>General Comments</u> <ul style="list-style-type: none"><li>The proposed plant species diversity as represented in the submitted schedule is satisfactory, however a diverse use of the species should be applied to all planted areas to encourage biodiversity, resilience and interest.</li><li>Canopy planting should be maximized to reduce the visual impact of the development, particularly the tall Snack Brands built forms to the south, compensating for the very limited tree planting that has been delivered as part of this approval.</li></ul>                         | <p>Landscape Plans have been updated to:</p> <ul style="list-style-type: none"><li>Increase the diversity and numbers of shrubs species; and</li><li>Increase, where possible, the diversity in trees and groundcovers.</li></ul> <p>As described in an earlier comment, the entire site has been classed as an IPA and the current landscape drawings have been assessed by Travers Bushfire and Ecology in meeting the RFS requirements. Therefore, an increase to canopy cover would result in tree canopies touching and conflicting with bushfire guidelines.</p> <p>Notwithstanding, further trees have been incorporated around the temporary truck parking area.</p> <p>Updated Landscape Plans form <b>Appendix C2</b> of this RTS package.</p> |
|           |                  | <u>Drainage and Other Easements</u> <ul style="list-style-type: none"><li>Additional tree plantings should be provided along the northern boundary at the top of the drainage easement to increase canopy and cooling and reduce the visual impact of Snack Brands very large built forms from the southbound road corridor. This will need to be considered having regard to the form and continued function of the easement.</li><li>Investigation should be undertaken into the realignment of the underground cables easement to enable additional scope for tree planting.</li></ul> | <p>Whilst Council's comments have been considered, it is noted that additional tree planting along the northern boundary is impractical for several reasons, including:</p> <ul style="list-style-type: none"><li>security issues of having climbable trees near the boundary fence;</li><li>the drainage easement embankment itself is too steep to accommodate trees; and</li><li>the top of the drainage easement embankment is too close the fenceline and only of a small area.</li></ul> <p>In addition, it is respectfully noted that the existing SBA highbay development is not the subject of this proposal.</p>   |





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|           |                | <p><u>Domain / Streetscape Considerations</u></p> <ul style="list-style-type: none"> <li>Additional canopy and visual amenity can be achieved through supplementary tree planting both sides of the utilities easements along Mamre Road. A staggered arrangement of appropriately sized tree species can achieve 100% linear canopy coverage. Screen planting should also include greater density of shrubs to compensate for trees not able to be planted in easements areas. Available space should be maximized for maximum canopy and screening possible</li> <li>Given the narrow width for rootzones between the easement root barrier and carpark hardstand surface, an engineered trench for tree planting should be investigated and considered to enable long term health tree root development for resilience in storm conditions.</li> <li>Provision of street tree planting at 8m centres to Distribution Drive is considered necessary and consultation should occur with Council regarding tree species. This could be addressed via conditions of consent.</li> <li>Provision of additional landscaping around sprinkler tank and pump room is recommended whilst providing necessary access to visually contribute to the streetscape and improve wayfinding at driveways.</li> </ul> | <p>100% linear canopy coverage cannot be achieved as per the bushfire compliances as mentioned in previous comments above.</p> <p>Shrub planting has been increased, where possible, while still meeting <i>Planning for Bushfire Guidelines</i>. Shrubs with a maximum height of 3.0m only can be incorporated in the electrical easements as per Endeavour Energy advice.</p> <p>Geoscapes have updated the Landscape Plans to include notes stating that trenching should be carried out for tree planting between the easement root barrier and carpark hardstand surface. This will involve making sure that the correct soil profiles are carried across the entire area to allow for better lateral root growth.</p> <p>It is noted that street trees have already been planted along distribution drive as part of estate works, if further trees are required these can be suitably conditioned.</p> <p>In addition to the above, the Landscape Plans have been updated to include landscaping around the sprinkler tank and pump room, as requested.</p> <p>Updated Landscape Plans form <b>Appendix C2</b> of this RTS Report.</p> |
|           |                | <p><u>Temporary truck parking area</u></p> <ul style="list-style-type: none"> <li>This area should be visually separated from the carpark with a garden bed that provides vegetated screening and shade planting, and reduces the visual impact of the 2m high palisade fence.</li> <li>The extent of compacted aggregate finish to the parking area is considerable. A number of islands planted with</li> </ul>   | <p>Landscape Plans have been updated to:</p> <ul style="list-style-type: none"> <li>Include a 2.0m wide strip to the south of the temporary truck parking area</li> </ul> <p>It is noted that the truck area is only temporary islands and WSUD areas are not considered to be suitable. as the entire area will be removed in the near future to make way</p>  |





## RESPONSE TO SUBMISSIONS REPORT

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

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|           |                | <p>large canopy trees and WSUD should be investigated to reduce heat generation. Pedestrian access from this carpark should also be considered and depicted (noting comments above regarding relocated and overflow parking).</p> <ul style="list-style-type: none"><li>Section BB demonstrates truck parking will be visible from the public domain and Mamre Rd. Dense screening is required meaning trees and groundcovers must be supplemented with dense shrub plantings that will achieve a size so that the full height of trucks cannot be seen from surrounding areas, as per DCP objectives.</li></ul> | <p>for future development. Trees are also likely to be damaged by moving trucks and other vehicles.</p> <p>Further, it is acknowledged that the shrub layer was missing from section BB, which has since been corrected. Notwithstanding, there are other requirements that have guided the implementation of shrubs, including:</p> <ul style="list-style-type: none"><li>A maximum height requirement of 3.0m within the electric easement, as per Endeavour Energy requirements.</li><li>Shrubs cannot be densely planted as per IPA requirements.</li></ul> |
|           |                | <p><u>Carparks</u></p> <ul style="list-style-type: none"><li>Increases to the diversity and density (decreased spacings) of trees to the perimeter edges of all carpark areas is considered necessary to achieve DCP objectives.</li><li>A carpark tree planting detail has not been provided. The tree pits should also be engineered (eg. Stratavault system, structural soil etc) to sustain rootzones noting comments above for wider landscape beds. Canopy cover in the carpark is also minimal and larger species should be considered in tandem with larger tree pits.</li></ul>                         | <p>In relation to increase in density, it is noted that the IPA requirements and bushfire restrictions limit these matters, as detailed in the above responses.</p> <p>For carpark tree planting, the Landscape Plans have been updated to include:</p> <ul style="list-style-type: none"><li>Structural soil detail; and</li><li>Larger species for the carpark islands following the change of wider pits and addition of structural soil.</li></ul> <p>Updated Landscape Plans form <b>Appendix C2</b> of this RTS Report.</p>                               |





**RESPONSE TO SUBMISSIONS REPORT**

Proposed Industrial food manufacturing facility  
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SSD-18204994

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|           | Building Certification        | <p>Under the Environmental Planning and Assessment Act 1979 SSD'S do not require a formal Construction Certificate, however "Certification" that the building will comply with the BCA will be required under the Act.</p> <p>A BCA report has been provided by "mckenzie group" advising that a "Performance Solution" will need to be formulated for some BCA non deemed to satisfy provisions. The report mentions that the performance solution is to be formulated at the CC stage although a CC is not required by the NSW Government Planning Industry &amp; Environment. Obtaining a CC, or not, will be up to the discretion of the NSW government.</p> <p>The building advice is.</p> <ul style="list-style-type: none"> <li>▪ Certification is to be obtained that the building works will comply with the Building Code of Australia in accordance with the Environmental Planning and Assessment Act 1979.</li> </ul> | Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.   |
|           | Public Health and Food Safety | <p>Council's submission to the SEAR's request sought detailed plans, sections and elevations of food handling and storage areas. These plans and drawings must demonstrate compliance with, AS4674 and Food Safety Standard 3.2.3 Food Premises &amp; Equipment. It was also suggested that the NSW Food Authority be consulted to determine if they would like a referral or not as the operation of the premises will be regulated by them and not Council. The submitted Environmental Impact Statement (EIS) specifically discusses the food fit out.</p> <p>Section 6.1.8 Food safety, on page 142 states: <i>"This section of the EIS evaluates the matters of food safety associated with</i></p>   | <p>Noted – no action required – it is proposed this be dealt with as part of an appropriately worded condition of consent.</p> <p>SBA currently comply with Cumberland Council and Blacktown City Council requirements; this proposed facility will ensure compliance with Penrith City Council requirements.</p> |





## RESPONSE TO SUBMISSIONS REPORT

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SSD-18204994

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|           |                | <p><i>the proposed development, as per the SEARs, in relation to food handling and processing and how NSW Food Authority standards and requirements will be met. SBA currently has a Quality Management System and Hazard Analysis Critical Control Points (HACCP) plans for all current and proposed processes, which will be updated with any new equipment at the new facility".</i></p> <p>The EIS further states: "Stage 1 of the development (including variety packing lines) has been HACCP certified and Safe Qualified Food (SQF), global food safety standard certified, which will be expanded to include certification for Stage 2 (including raw materials &amp; manufacturing) once the site starts operating. Customer standards will also be implemented (CFMSR, WSE, Aldi) as per current SBA sites".</p> <p>It is therefore recommended that conditions be imposed that require compliance with the following:</p> <ul style="list-style-type: none"><li>▪ <i>Ongoing compliance with AS4674, Food Safety Standard 3.2.3 Food Premises &amp; Equipment; and</i></li><li>▪ <i>The Stage 2 recommendations above relating to the applicants own Quality Management System and Hazard Analysis Critical Control Points (HACCP) plans for all current and proposed processes and any new equipment at the new facility be conditioned.</i><p>Council's submission to the SEAR's request also sought details that include, but are not limited to, the number of systems, type of systems, system details and location of system. The EIS and supporting information and reports are largely silent on Regulated Systems (Cooling Towers) other than a reference in the Noise Report regarding the location of plant on the roof and a maximum db(A) level. This should</p></li></ul> |                 |





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|           |                | <p>be clarified with the applicant and / or it is recommended that conditions be placed on any consent as follows:</p> <ul style="list-style-type: none"> <li>▪ <i>Any regulated system must be installed in accordance with AS/NZS 3666.1:2011 Air-handling and water systems of buildings—Microbial control—Design, installation and commissioning, as applicable to the specific system. A certificate is to be obtained and submitted to Council certifying that the system has been installed in accordance with the Public Health Act 2010, Public Health Regulation 2012 and AS3666.1:2011.</i></li> <li>▪ <i>Any regulated systems intended to be installed on the site must be registered with Penrith City Council by completing the registration form for regulated systems. This form is to be returned to Council prior to the issuing of the Occupation Certificate and operation of the system;</i></li> <li>▪ <i>Any regulated systems must be operated and maintained in accordance with the Public Health Act 2010, Public Health Regulation 2012, AS3666.3:2011 Air-handling and water systems of buildings – Microbial control – Performance-based maintenance of cooling water systems and the current edition of the NSW Code of Practice for the Control of Legionnaires Disease;</i></li> <li>▪ <i>There must be safe and easy access to a regulated system (as defined in the Public Health Act 2010) for the purpose of the cleaning, inspection and maintenance of the system;</i></li> <li>▪ <i>Any liquid discharge from the regulated system, resulting from the operation, maintenance and/or cleaning operations, is to be disposed of into the sewer system. Discharge into the stormwater disposal system is not permitted; and</i></li> </ul> |                 |





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|              |                      | <ul style="list-style-type: none"> <li>All chemicals shall be stored in adequately labelled containers with tight fitting lids and bunded or stored in such a way to prevent the chemical entering the stormwater system.</li> </ul>   |   |
| <b>TfNSW</b> | Transport Assessment | 1.a. The TA states that a total of 274 car parking spaces are proposed for the overall Lot 10 & 11 site, including an additional 160 spaces (as part of the extension) to the existing 114 spaces. This is still a deficit of 183 spaces in accordance with the Mamre West DCP. TfNSW raises the question as to how will this impact the circulation in the local network and interface with Mamre Road.   | <p>As discussed in the Ason Group Transport Assessment (Appendix 17 of the EIS), it is expected that there will be up to 380 employees (415 during seasonal peak periods) over 24 hours which are broken up over the day, afternoon, night and office shifts, across the whole facility.</p> <p>At any given time, the maximum on-site parking demand for the site is expected to be approximately 226 spaces during non-seasonal peak periods and 259 spaces during seasonal peak periods. Therefore, the proposed 266 car parking spaces are considered sufficient to accommodate the actual on-site parking demand (as determined by the First Principles Assessment).</p> <p>In summary, the First Principles Assessment undertaken as part of the Transport Assessment confirms that the proposed on-site parking supply will be sufficient to accommodate the SBA operation for Stages 1 and 2.</p> |
|              |                      | 1.b. The TA relies on outdated data from the approved First Estate Masterplan. The Masterplans base model does not take into account the current traffic flows in the area and therefore does not adequately indicate what the actual impacts will be as a result of this development. In addition it is not clear whether the current interim access (Distribution Drive and Mamre Road) works efficiently and what the impacts will be with the additional traffic proposed under this development. It is recommended that updated data be | It is noted that the application of the Mamre Road Precinct (MRP) traffic generation rates, as suggested by TfNSW, has already been applied in a separate traffic study currently under review by TfNSW. The modelling results indicate that the road network can perform acceptably in the future years analysed (2026, 2031 and 2036) further to factoring in the higher MRP trip rates for the entire Mamre West Precinct including stages 1 and 2 of SBA.   |





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2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

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|           |                | provided to validate any model undertaken to date. TfNSW requests the raw SIDRA files for review once the model has been updated. The model is to be provided in line with TfNSW key issues advice for consideration in the draft SEARs.   | <p>Regardless, as indicated in the Transport Assessment (Appendix 17 of the EIS), the proposed SSD traffic has already been analysed and approved under previous SSDs and as such, additional modelling for this SSD is not deemed necessary.</p> <p>Finally, it is again important to emphasise that DPE has previously agreed that additional modelling specific to this SSD is not required.</p> <p>In summary, no additional modelling is needed for this SSD.</p>   |
|           |                | 2. It should be noted that TfNSW support for the rezoning for Mamre West Stage 1 was contingent on the delivery of the fourth leg at the James Erskine Drive/Mamre Road signals and concurrent decommissioning of the temporary signals at Distribution Drive/Mamre Road to left in/left out. This position is consistent with the original 2016 Mamre West rezoning by DPE. | <p>Refer to the response above.</p> <p>The additional modelling undertaken as part of the "other" transport studies will review the performance of the intersections in the longer-term future. The traffic associated with this SSD has already been approved through previous SSD approvals (indicated in the original TA) and as such, additional modelling for the purpose of this study is deemed unnecessary. Furthermore, we have discussed this approach with NSW DPE before and they have agreed that no additional modelling is needed (refer to <b>Appendix C4</b>). Hence, it is suggested that this SSD can be approved without additional modelling.</p> |
|           |                | 3. Mamre Road is an approved PBS 2B route and large industrial development within Western Sydney Employment Area should consider PBS 2B as the design vehicle. However, the Transport Assessment (TA) site accesses and internal hardstand areas have been designed to cater for trucks of up to 26.0 metres B-doubles.  | <p>Refer to the Ason Group RTS Letter contained within <b>Appendix C4</b>, which showcases the swept path assessment with the 30.0m PBS Level 2B vehicle (30.0m Super B-double truck) as the chosen design vehicle.</p> <p>The swept path assessment indicates that the 30.0m Super B-double truck can enter and exit the Site as</p>  |





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|           |                | The TA needs to graphically demonstrate site accesses and internal hardstand areas have been designed to cater for trucks of up to a 30m PBS Level 2B vehicle.   | required. Furthermore, the swept path assessment also demonstrates the 30.0m Super B-double truck manoeuvring through the hardstand area.  |
|           |                | <p>4. The TA has acknowledged two RSDs where B-doubles will be need to be reversed to unload from the rear. As the rear trailer is in the way, the front trailer (or A-trailer) of a B-double is typically unloaded by de-coupling the trailers, or jack-knifing the combination.</p> <p>The TA needs to clarify whether a de-coupling area is required so that both the 'A' and 'B' trailers can be unloaded from the rear for the two RSDs which require Bdouble reverse movements</p>   | <p>Refer to the Ason Group RTS Letter contained within <b>Appendix C4</b>, which shows the proposed de-coupling area on AG03 and AG04. The decoupling zone is in line with the relevant AS requirements.</p> <p>Furthermore, a swept path analysis has been undertaken to indicatively show the operation of this zone as well.</p>  |
|           |                | <p>5. The utilities proposed to service the site need to be coordinated with the Mamre Road upgrade stage 1 works. TfNSW would like to avoid relocation of new utilities where possible.</p> <p>TfNSW requests the applicant to provide the DWG of the proposed utilities to service the site. From the infrastructure report, this includes:</p> <ul style="list-style-type: none"> <li>▪ Electrical services</li> <li>▪ Telecommunication</li> <li>▪ Sewer</li> <li>▪ Potable water</li> <li>▪ Gas</li> </ul> <p>In addition it is requested that DWG's of the applicants architectural and civil plans be provided in order for TfNSW to review against TfNSW road design to ensure there are no conflicts.</p> | <p>All services currently in design are being reviewed by the relevant authorities in consultation with TfNSW.</p> <p>DWG files are not available; however the following information is provided within <b>Appendix C11</b> of this RTS Report:</p> <ul style="list-style-type: none"> <li>▪ Plan of SBA Electrical feeder route;</li> <li>▪ Telecommunications DBYD;</li> <li>▪ Site plan for sewer and water;</li> </ul> <p>Jemena are currently completing the gas design with TfNSW and other agencies. The existing SBA site plans indicate, where the boundary connection will be.</p> |





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|           |                | <p>6. Future Transport 2056 emphasises the importance of walking and cycling for short trips and reinforces the importance of walking and cycling to increase the catchment of public transport as part of the whole customer journey.</p> <p>Building Momentum - State Infrastructure Strategy 2018-2038 includes recommendations related to walking and cycling, including integrating transport with land use; managing travel demand; unlocking capacity in existing assets; and improving population health outcomes through more active transport.</p> <p>The Transport Assessment (TA), states The Mamre West DCP does not provide Bicycle Parking provision, so the TA referenced the Mamre Road Draft DCP, Table 12, which directs the use of the DPE Planning Guidelines for Walking and Cycling 2004. Note: The NSW Planning Guidelines for Walking and Cycling has been superseded by Cycling Aspects of Austroads Guides, 2017, which recommends that bicycle parking for all-day use on a regular basis should be expected to be combined with end-of-trip facilities such as showers, lockers etc.</p> <p>Use of the Cycling Aspects of Austroads Guides, 2017, Appendix I – Bicycle Parking provisions results in the need for 70 secure bicycle parking spaces with adequate end-of-trip facilities provided.</p> <p>It is requested that prior to the issue of the Construction Certificate, the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and visitors in accordance with Australian Standard AS1742.9:2018 Manual</p> | <p>Bicycle storage is shown, on drawing A001 of the Architectural Plans contained within <b>Appendix C1</b> of this RTS Report, at the entrance to the warehouse. This will be constructed to ensure that it is secure. EOT facilities are located on level 1 of the office area.</p> |





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|           |                            | <p>of Uniform Traffic Control Devices - Bicycle Facilities, and Cycling Aspects of Austroads Guides, 2017 including:</p> <ul style="list-style-type: none"> <li>Locate bicycle parking and storage facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines.</li> </ul>   |                            |
|           | Freight and Heavy Vehicles | <p>7. The Transport Assessment (TA), Section 3.4 – Journey to Work Travel Mode Share Review states: “Noting the high preference for private vehicle usage over the other modes, it is considered that there is latitude to encourage a move to other travel modes in the longer term which would reduce the pressure on the road network system.</p> <p><i>One such tool to assist in this shift away from private vehicle usage is the implementation of strategies forming part of a Workplace Travel Plan (WTP). This, however, does not form part of the scope for the purposes of this SSDA application but forms part of Conditions of Consent under the First Estate SSD-7173.”</i></p> <p>It is noted in Table 5: Response to TfNSW’s Advice that the proponent is agreeable to preparing a detailed Work Place Travel Plan as a condition of consent to this SSD.</p> <p>It is requested that prior to commencement of operation, the applicant be conditioned to prepare a Work Place Travel Plan and Transport Access Guide in consultation with TfNSW (development.sco@transport.nsw.gov.au) to reduce the proportion of single-occupant car travel and increase the mode share of car sharing, public transport and active transport for the development.</p> | No action required for DA. |





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|                     |                      | The applicant is to submit a copy of the final Work Place Travel Plan and Transport Access Guide to TfNSW for review. TfNSW offers a range of advice, templates and guidelines to assist in preparing Work Place Travel Plan and Travel Access Guides. These resources may be found at:<br><a href="https://www.mysydney.nsw.gov.au/travelchoices/tdm">https://www.mysydney.nsw.gov.au/travelchoices/tdm</a> .  |  |
| <b>Sydney Water</b> | Water Servicing      | <ul style="list-style-type: none"> <li>The EIS and Infrastructure Report note Sydney Water advice that the potable water connection for this development will be a future DN300 potable water main in Mamre Road, which will be delivered by neither the Applicant nor Sydney Water.</li> <li>Delivery of this DN300 potable water main has been delayed and is expected to occur in c 2022. There will be no potable water connections prior to this date.</li> <li>Any changes to the connection point, such as to the existing DN200 potable water main on Mamre Road will need to be confirmed as acceptable by Sydney Water.</li> </ul>  | No action required – understood and noted.   |
|                     | Wastewater Servicing | <ul style="list-style-type: none"> <li>The EIS and Infrastructure Report note a new sewer gravity pipe will be required to connect to the existing Sydney Water DN600 sewer main within Mamre Road (north of pipeline) and that this proposed pipe will be approximately 950m in length. This advice has been superseded.</li> <li>The Wastewater Modelling Technical Report and hydraulic modelling undertaken by Sydney Water has indicated that the average sewer demand for the site is 23.2L/s, rather than the 13.9L/s as estimated in EIS and Infrastructure reports.</li> <li>Due to this significant flow increase, a staged wastewater servicing approach has been identified as</li> </ul> | <p>SBA is currently working with Sydney Water to define their wastewater servicing solution, under commercial agreement.</p> <p>Detailed requirements, including any potential extensions or amplifications, will be provided by Sydney Water once the development is referred to Sydney Water for a Section 73 application (following development consent).</p> |





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|           |  | <p>required. It involves a pressure system with pumped flows from a private pump station to St Marys in the interim, and a pressure system with pumped flows from a private pump station to Upper South Creek from circa 2026.</p> <ul style="list-style-type: none"> <li>With this servicing option, a private treatment plant and a private sewer pump station (SPS) will be located on site to manage the wastewater produced by the development. Both will be entirely developer funded and will be owned and operated privately. Sydney Water will not be maintaining wastewater infrastructure on this site.</li> <li>A temporary pressure main designed and delivered by Snack Brands will need to connect the SPS to the Sydney Water wastewater network, discharging to St Marys Water Recycling Plant in the short term (interim).</li> <li>Once the new USC AWRC is in operation (c2026), a pressure main delivered by Snack Brands will connect the SPS to the Sydney Water wastewater network with the full load transferring ultimately to the USC AWRC.</li> <li>As the hydraulic consultant for Snack Brands, Sydney Water has also identified an alternative option. However, this will only be feasible after December 2024 and may not meet Snack Brands' current timeframes. This may be investigated in further detail and any alterations noted within finalised S73 applications.</li> </ul> |   |
|           | Integrated Water Cycle Management and Circular Economy | <ul style="list-style-type: none"> <li>There is an opportunity for the development to receive recycled water supply from the Mamre Road Recycled Water Network, supplied from the Upper South Creek Advanced Water Recycling Centre (USC AWRC). Sydney Water is currently investigating the feasibility of this</li> </ul>  | SBA will continue to work with Sydney Water to progress both recycled water and circular economy opportunities. |





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|                           |                              | <p>option alongside requirements for additional treatment of food-grade manufacturing.</p> <ul style="list-style-type: none"><li>▪ Sydney Water is also investigating the feasibility and implementation of circular economy opportunities including waste to energy and/or efficiencies in trade waste.</li><li>▪ Sydney Water looks forward to engaging with Snack Brands to progress both recycled water and circular economy opportunities.</li></ul>  |   |
| <b>Rural Fire Service</b> | Recommendation of conditions | <p>Upon review of the Environmental Impact Statement and supporting documentation, the NSW Rural Fire Service provides the following recommended conditions:</p> <p><b>Asset Protection Zones</b></p> <p><i>Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.</i></p> <p>1. From the start of building works and in perpetuity, both lots must be entirely managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of <i>Planning for Bush Fire Protection 2019</i>. When establishing and maintaining an IPA, the following requirements apply:</p> <ul style="list-style-type: none"><li>▪ Tree canopy cover be less than 15% at maturity;</li><li>▪ Trees at maturity are not touching or overhang the building;</li><li>▪ Lower limbs are removed up to a height of 2m above the ground;</li><li>▪ Tree canopies are separated by 2 to 5m;</li></ul> | <p>Noted – landscaping will conform with all Asset Protection Zones, all relevant construction standards including the <i>National Construction Code</i> and Table 7.4a of <i>Planning for Bush Fire Protection 2019</i>.</p> |





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| SUBMITTER | MATTERS RAISED | COMMENTS / REQUESTS   | FORMAL RESPONSE |
|-----------|----------------|---|-----------------|
|           |                | <ul style="list-style-type: none"><li>Preference is given to smooth-barked and evergreen trees;</li><li>Large discontinuities or gaps in vegetation are provided to slow down or break the progress of fire towards buildings;</li><li>Shrubs are not located under trees;</li><li>Shrubs do not form more than 10% of ground cover;</li><li>Clumps of shrubs are separated from exposed windows and doors by a distance of at least twice the height of the vegetation.</li><li>Grass to be kept mown (as a guide grass should be kept to no more than 100mm in height);</li><li>Leaves and vegetation debris are removed; and</li><li>NSW Rural Fire Service's document Standards for asset protection zones.</li></ul> <p><b>Construction Standards</b></p> <p><i>Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.</i></p> <p>2. Any new Class 10b structures as defined per the <i>National Construction Code</i> must be non-combustible.</p> <p><b>Water and Utilities</b></p> <p><i>Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.</i></p> <p>3. The provision of water, electricity and gas must comply with Table 7.4a of <i>Planning for Bush Fire Protection 2019</i>.</p> |                 |





### **3.2 RESPONSE TO PUBLIC AND OTHER STAKEHOLDER SUBMISSIONS**

No public submissions were received for the project.





## PART D SUMMARY OF CHANGES

In reviewing the submissions received from various agencies, some amendments to the project are proposed. However, it is noted that most matters required further clarification, rather than design changes for the project. Items for clarification and their related responses are provided within **TABLE 1** of this RTS Report.

The following subsections outline the project amendments and any necessary environmental assessment and/or commentary.

### 4.1 PROJECT DESCRIPTION

Construction of the proposal would involve no substantive demolition activities but will comprise minor earthworks (cut and fill), erosion and sediment control, building and construction of pavements and hardstand, and construction of a new warehouse and associated offices.

The built form component of the proposed development includes the construction of an industrial manufacturing facility (27,385m<sup>2</sup>), which is to be located adjacent to (and will constitute an extension to) the existing warehouse at 2 Distribution Drive, Orchard Hills. The proposed development involves:

- Site preparation works
- Conversion of 5,217m<sup>2</sup> existing warehouse to manufacturing operations
- Additional warehouse/manufacturing area (including mezzanines) of 19,582m<sup>2</sup>
- Second stage addition of 2,813m<sup>2</sup>
- Ancillary office area of 2,485m<sup>2</sup>
- 152 car parking spaces
- Wastewater treatment plant of 2,155m<sup>2</sup>
- Outdoor pallet storage area of 350m<sup>2</sup>
- Business identification signage
- Hardstand area for temporary truck parking
- Ancillary infrastructure
- Complementary landscaping

Consent is sought to develop the subject site for an Industrial food manufacturing facility, in accordance with the following provisions.

**TABLE 2: PROPOSED DEVELOPMENT PARTICULARS**

| Project Element          | Development Particular   |
|--------------------------|--|
| <b>Site Area</b>         | Lot 10 = 51,715m <sup>2</sup><br>Lot 11 = 52,715m <sup>2</sup> (part lot only – 5,217m <sup>2</sup> )  |
| <b>General</b>           | The proposed development is considered SSD, pursuant to Schedule 1, Section 3 of SRD SEPP  |
| <b>Primary Land Use</b>  | Industry   |
| <b>Operation</b>         | Industrial food manufacturing facility with production capacity up to 50,000mT/year  |
| <b>Total GFA</b>         | Lot 10 = 24,725m <sup>2</sup> (Stage 2A)<br>2,813m <sup>2</sup> (Stage 2B)<br>Lot 11 = 5,217m <sup>2</sup> conversion (warehouse to manufacturing) |
| <b>Floor Space Ratio</b> | Lot 10 = 0.478:1 (Stage 2A)<br>0.529:1 (Stage 2B)  |





**TABLE 2: PROPOSED DEVELOPMENT PARTICULARS**

| Project Element          | Development Particular   |
|--------------------------|--|
|                          | Lot 11 = 0.575:1 (no change)   |
| <b>Building Height</b>   | 19.4m  |
| <b>Number of Stories</b> | Two (2) stories  |
| <b>Landscaping</b>       | 8,050m <sup>2</sup>  |
| <b>Earthworks</b>        | Earthworks components are proposed for Lot 10 as follows: <ul style="list-style-type: none"> <li>2,750m<sup>3</sup> of cut</li> <li>33,082m<sup>3</sup> of fill</li> </ul> |
| <b>Car parking</b>       | 152 new  |
| <b>CIV</b>               | \$222,532,480.00 (exc. GST)  |
| <b>Construction Jobs</b> | Approximately 497 direct construction jobs   |
| <b>Operational Jobs</b>  | 336 proposed for manufacturing   |

## 4.2 OPERATIONS

This proposal seeks to develop an industrial food manufacturing facility adjacent to the existing SBA distribution centre at Orchard Hills. There are no key changes proposed to the sought operational outputs, as part of this RTS Report. Currently SBA manufactures food products at two separate facilities located in Blacktown and Smithfield, before transporting the finished goods to Orchard Hills distribution centre for storage and later distribution. The proposed development seeks to consolidate the two existing manufacturing facilities into one new facility adjacent to the distribution centre.

The project seeks to reduce production costs through:

- Elimination of finish product shuttle
- Reduce loss of product
- Increase energy efficiency
- Reduced energy consumption

Current production volumes for SBA (at their existing Blacktown and Smithfield manufacturing facilities) are over 36,000 mT per year, with the investment (as part of the proposed development) in capacity for growth to approximately 50,000 mT per year. This application seeks consent for production capacity up to 50,000 mT per year.

The proposed development involves the transfer of operations and the replacement of outdated equipment, including:

- Development and installation of a corn processing and packaging plant
- Development and installation of a potato processing and packaging plant
- Transfer and installation of a cereal processing and packaging plant
- Transfer and installation of associated end of line equipment and wastewater treatment plant

The food products that will be manufactured primarily comprise of potato, corn and extruded snack food products, sold under well-known brands such as Kettle, Thins, CC's, Cheezels, Jumpy's and The Natural Chip Company.

The proposed facility will comprise different areas for processing and packaging of snack foods, within a new purpose-built warehouse. A section of the existing low bay warehouse (approved under SSD-9429) is to be converted for cereal processing and packaging and storage of raw material. The





food manufacturing activities at the subject site will operate process lines for the processing and packing of potato and corn products and is anticipated to include:

- Receival of raw (i.e. potatoes and corn) and other materials;
- Storage and handling raw materials;
- Processing raw materials such as peeling and slicing;
- Cooking food products:
  - Potatoes will be cooked in an oil fryer;
  - Corn will be dried in an oven and then cooked in an oil fryer;
- Packaging and distributing the final product;
- Accumulating, storing and disposing of food wastes and food-preparation wastes; and
- Onsite wastewater treatment

The facility is proposed to operate 24 hours a day, seven days a week, in line with the existing operations of the SBA warehouse and distribution facility.

#### 4.2.1 Staff

The maximum anticipated employee numbers on site at any one time, and associated with only the proposed manufacturing operations, is expected to be approximately 157 staff (with additional provision for shift changeover). **TABLE 3** provides a breakdown of staff numbers.

| <b>TABLE 3: STAFF SHIFT NUMBERS</b> |                             |                                    |                               |                |              |
|-------------------------------------|-----------------------------|------------------------------------|-------------------------------|----------------|--------------|
| <b>Type</b>                         | <b>Weekday</b>              |                                    |                               | <b>Weekend</b> | <b>Total</b> |
|                                     | <b>Day<br/>(5:00-15:00)</b> | <b>Afternoon<br/>(13:00-23:00)</b> | <b>Night<br/>(21:00-7:00)</b> |                |              |
| Salaried                            | 85.0                        | 13.0                               | 12.0                          | 6.0            | 116.0        |
| EBA                                 | 70.0                        | 68.0                               | 67.0                          | 0.0            | 205.0        |
| Labour hire (casual)                | 1.9                         | 6.9                                | 5.9                           | 0.0            | 14.7         |
| <b>Total</b>                        | <b>156.9</b>                | <b>87.9</b>                        | <b>84.9</b>                   | <b>6.0</b>     | <b>335.7</b> |

#### 4.2.2 Customer and visitors

The site is designed to accommodate customer visits and tours; however, these visits are not regular and on as needs bases and are managed through normal business hours.

Visitors to the site are limited to auditors, suppliers of packaging material, raw material, equipment providers and contractors. Packaging material, raw material and equipment providers visitor are managed to normal business hours. Equipment contractors are managed through our maintenance operating system and are expected to be on site as per agreed schedules.

#### 4.2.3 Deliveries and truck movements

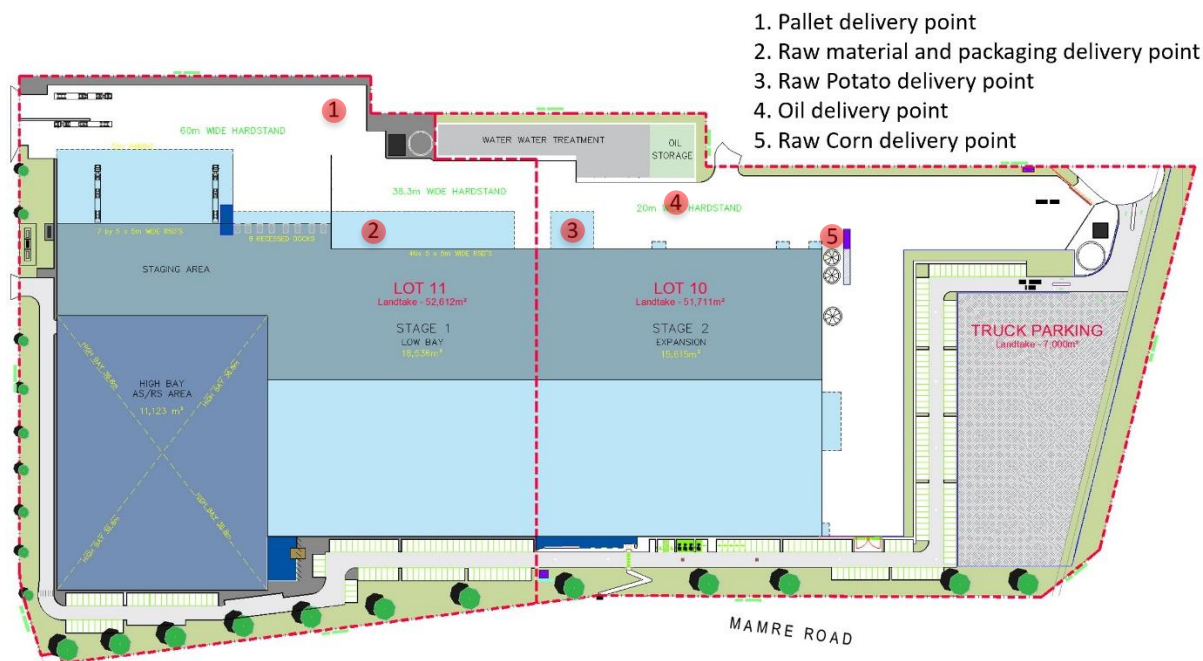
The proposed development will enable the elimination of the shuttle transfer of finished products from the existing manufacturing facilities in Smithfield and Blacktown (approx. 4 trucks per hour) to the Orchard Hills warehouse and distribution centre. The deliveries of raw materials to the new proposed manufacturing facility will remain the same as the consolidated number to the existing sites (approx. 5 trucks per hour).

The remaining vehicle movements through the subject site are to accommodate the current warehouse operations, being 5 delivers or dispatches per hour and employees entering and exiting the site.





**Figure 1** below shows the location of deliveries for the different materials and products. At point 2, deliveries will include packaging (cases, film, plastic film, cardboard cartons) and raw ingredients (rice flour, polenta flour, pellets and seasoning). These are all pallet-based quantities, as described in the submitted Operational Summary Report (Appendix 26 of the EIS).



**Figure 1 SBA Delivery Diagram** (Source: SBA, 2021)

#### 4.2.3.1 Temporary truck parking

Consent is sought for the minor works of creating a suitable area for trucks to lay up when required, on a temporary seldom basis.

This site services SBA customers nationally and will have line haul vehicles that travel between this site and Melbourne, Brisbane and Adelaide. These drivers arrive on site at various times and often require a safe place to park during their rest breaks. The Chain of Responsibility is very clear about drivers test breaks and parking a truck in Distribution Drive would mean that they may be liable for fines etc. There are also requirements for potential truck and trailer storage over a weekend and driver changeover points based on the number of hours a driver has worked.

The abovementioned arrangement is likely to remain in place until such time that a subsequent approval is obtained for this portion of land, which may be within the next 5 to 10 years.

#### 4.2.4 End product customers

Transfer of finished products to SBA end customers is achieved via a 3PL transport provider or retailer primary freight, with the site design to accommodate three (3) dispatch loads per hour.

Finished goods are distributed via the retail or wholesale trade with the retail trade accounting for approximately 90% of all vehicle movements.

#### 4.2.5 Food production



The proposed operations constitute three (3) processes:

1. Potato based products which are similar for all potato base processes, except *Jumpy's*
2. Corn based products which are similar for all corn-based processes, such as *CC's* and *Nature Earth*
3. Extruded products which are similar for all cereal based processes, such as *Cheezels* and *Chickadee's*

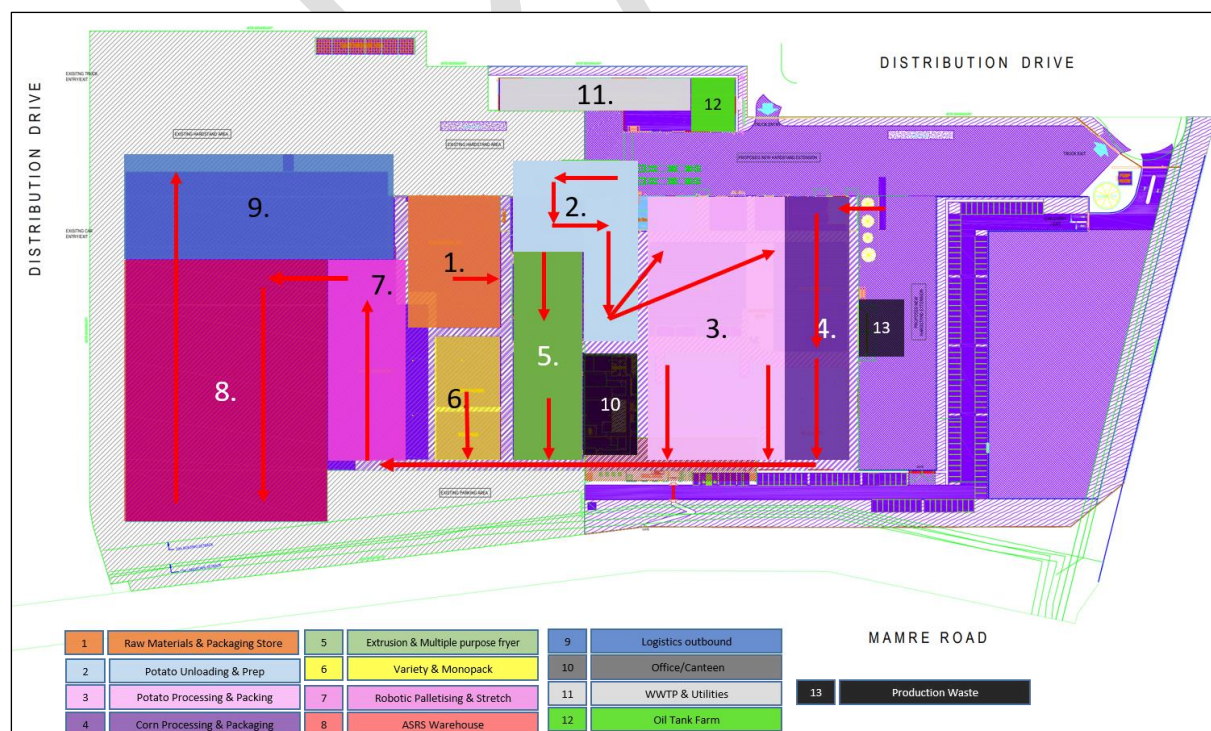
The two (2) main processes proposed for the subject site involve production of potato and corn products.

(1) Potato —

- i. Raw unbrushed potatoes received
- ii. Potatoes unloaded into storage bunkers while awaiting quality assurance (QA) inspection
- iii. Potatoes peeled and sliced
- iv. Sliced potatoes then cooked in oil fryers
- v. Product then seasoned in tumblers
- vi. Product then bagged and packaged onto conveyor into the completed Stage 1 storage and distribution system

(2) Corn —

- i. Raw corn kernels received
- ii. Corn unloaded into storage silos
- iii. Corn is then clipped and prepared
- iv. Corn cooked in water soaking tanks
- v. Product is then cooked in oil fryers and dried in oven
- vi. Product then bagged and packaged onto conveyor into the completed Stage 1 storage and distribution system



**Figure 2** Operational Flow Diagram (Source: SBA, 2021)



#### 4.2.5.1 Product inputs/outputs

The just in time principle of raw materials delivery and storage is adopted by SBA, rather than on site storage. Potato, corn and oil are delivered daily by truck to the site and each delivery (up to 46,000 kg) is stored in individual bunkers or silos until utilised. The potatoes and corn are cleaned and weighed as required and mechanically transferred to the processing halls for cooking. Other raw and packaging materials are stored within the main building and transported to a manufacturing area when required.

The new site will have the capacity to store up to 460 tonnes (t) of raw potatoes, 240 t of raw corn, 360 t of cooking oil and approximately 3,500 pallet spots for raw materials and packaging.

Details on material inputs (raw materials and other) outputs (snack products and waste) are outlined in **TABLE 4**. Delivery locations of different products and materials out illustrated in **Figure 1**.

| <b>TABLE 4: PRODUCT INPUTS/OUTPUTS</b> |   |
|--|---|
| <b>Product Description</b>             | <b>Quantities (weekly)</b>  |
| Raw potato delivered                   | Approximately 1,500 t to 2,000 t per week<br>(equates to approximately 90,000 t per annum; expandable to 3,000 t over a five (5) day operational utilisation).                  |
| Raw corn delivered                     | Approximately 140 t per week<br>(equates to approximately 7,000 t per annum, expandable to 240 t over a five (5) day operational utilisation).                                  |
| Oil delivered                          | Approximately 100 kL per week<br>(equates to 13,400 kL per annum, with up to two (2) deliveries per day expected).  |
| Cereal flour delivered                 | Approximately 70 t per week<br>(equates to 340 t per annum, with up to one (1) delivery per day expected).  |
| Flours and seasonings delivered        | Approximately 50 t per week<br>(equates to 240 t per annum, with up to one (1) delivery per day expected).  |
| Finished snack products                | Approximately 2,500 pallets per day or 700 t per week.<br>(expandable to 3,250 pallets per day over a five (5) day operational utilisation).                                    |
| Raw product waste (potato and corn)    | Approximately 7%.<br>(equates to approximately 50 t per week, increasing up to 70 t per week when at full utilisation; however the site is being designed to reduce waste <4%). |

#### 4.2.6 Mechanical plant

##### 4.2.6.1 Potato plant

The potato process starts with mechanical transfer to the potato prep area. This area of the plant will wash, peel and quality sort the potato preparing it to be cooked. Post sorting, the potato is hydraulically transfer to the processing hall. Each potato is then sliced to the required thickness and profile ready to be cooked through one of five potato fryers. Once the frying process has been completed, the chip is once again quality sorted via an automated optical station ready for mechanical transfer to product seasoning.





#### **4.2.6.2 Corn plant**

The corn process starts with mechanical transfer to the corn cooking area. This area of the plant will cook and soak corn preparing the cooked corn kernels to be hydraulically transferred to the corn processing hall where the corn will be washed and milled into a masa dough across two processing lines. The dough will be sheeted and cut to the required size and shape. The shapes are cooked via an inline oven and oil frying process. The cooked chip is then mechanically transferred to product seasoning.

#### **4.2.6.3 Cereal plant**

The Cereal processing starts with bulk bags of corn and rice flour being transferred pneumatically to a mixing silo. Once the correct blend is achieved, the mix is pneumatically transferred to one of two extrusion cooking process to form the desired shape and texture before being oven dried. The cooked snack is then mechanically transferred to product seasoning.

#### **4.2.6.4 Multipurpose plant**

The multipurpose plant is capable of creating both pellet and sheeted snacks.

The pellet product is brought into the site as a preform and mechanically unloaded onto the processing line prior to the fryer. The pellet product is in a solid raw form, traditionally made from a corn flour, rice flour flake and starch. Each pellet does also have additional ingredients to ensure a unique eating experience. The pellet is cooked before being mechanically transferred to product seasoning.

The sheeted snacks utilise a number of ingredients that come in bulk bags or smaller (approximately 15kg) bags. Ingredients are then tipped into a mixing vessel, blended and then mechanically transferred to a wet mixing vessel where a dough is generated. As a dough the product will be sheeted and cut to the required size and shape. The shapes are cooked through a fryer before being mechanically transferred to product seasoning.

#### **4.2.6.5 Packaging and palletising**

Following the cooking process, the product is supplied directly to multiple in-line seasoning units before being weighed into individual packets (bagging). Each bagging station is similar and independent. The packs are mechanically transferred to automatic case packers. The finished case is conveyed to automatic palletisers and transferred to the adjacent warehouse for storage. Customer orders are subsequently picked and loaded onto truck for delivery.

#### **4.2.6.6 Site utilities**

##### **Wastewater treatment plant**

The proposal includes a wastewater treatment plant that is designed to allow for the recycling of water, through the manufacturing process, and any water discharge to sewer to be cleaned to meet Sydney Water consent to discharge requirements.

Sydney Water discharge requirements were supplied to SBA in July 2021, which are considered draft compliance figures at this stage of the process. These figures are the allowable discharge requirements, subject to final confirmation. Further consultation has been undertaken by SBA with Sydney Water, with a Wastewater Modelling Technical Report being issued by Sydney Water on 15 October 2021.





The proposed wastewater treatment plant intends to reduce the volume of wastewater held on site and increase the volume of water being recycled for reuse. The Wastewater Modelling Technical Report and hydraulic modelling undertaken by Sydney Water has indicated that the average sewer demand for the site is 23.2L/s.

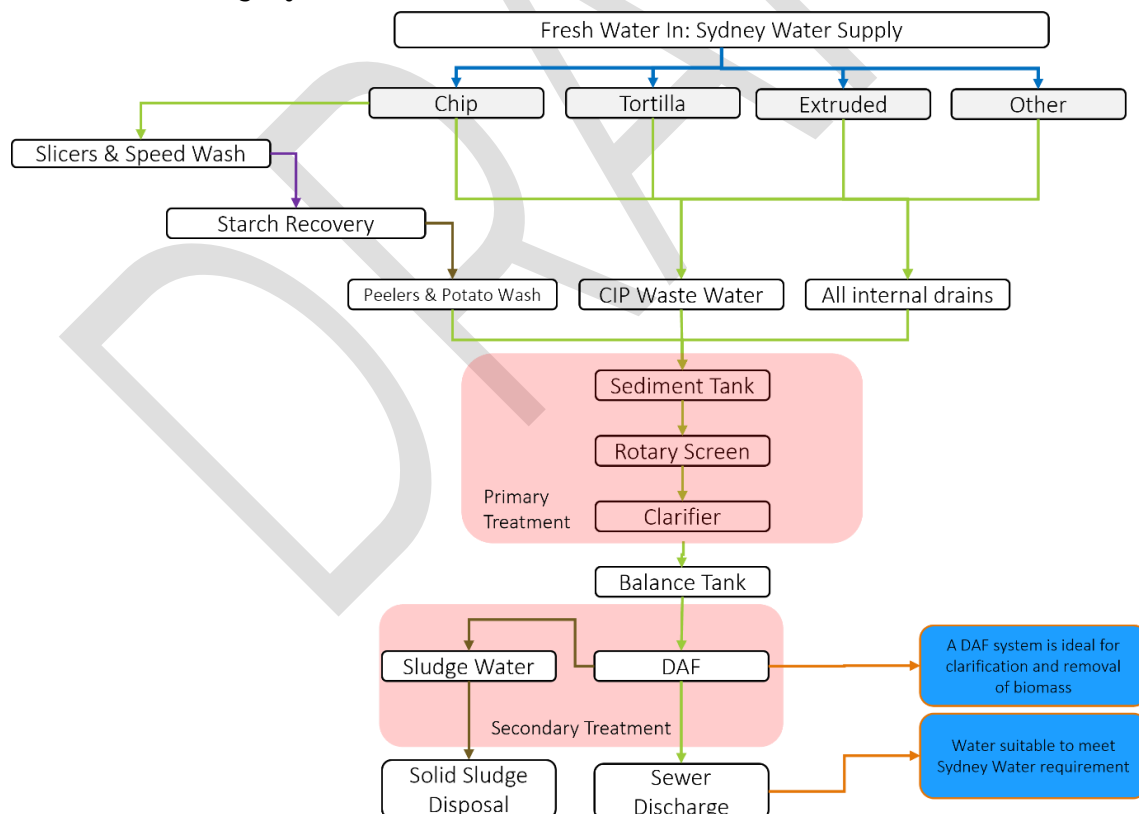
To accommodate such flows, a staged wastewater servicing approach will be provided, involving a pressure system with pumped flows from a private pump station to St Marys in the interim, and a pressure system with pumped flows from a private pump station to Upper South Creek from circa 2026.

Sydney Water has indicated that St Mary's facility can manage the proposed discharge volumes from SBA. It is understood that future plans by Sydney Water include the construction of a new Advanced Water Recycling Plant by 2026, which would accommodate any future increases in volume, which would of course be subject to future DA.

The current proposed servicing option involves a trade waste and pumping station, which will be located on site to manage the wastewater produced by the development. The pumping station is expected to be located in the north-west corner of the subject site, refer to **Appendix C10**.

The trade waste and pumping station will be designed to capture and treat the processing waste (from labs, airlocks and factory entries) within the site, it will not be design to treat effluent from the onsite bathrooms, change rooms or kitchens.

All effluent from site bathrooms, change rooms or kitchen transfers are expected to utilize the current First Estate sewerage system.



**Figure 3 Wastewater Treatment Plant Process** (Source: SBA, 2021)



## Compressed air plant

The compressed air plant consists of three oil-free screw compressors. The compressed air is dried in glycol cooled air dryers.

## Electrical power supply

Electrical power will be provided to the site by up to four 11 kV incoming lines to an Energy Australia substation.

### 4.3 BUILT FORM

Following the review and consideration of submissions received, some design changes have been accommodated, where necessary. Such design changes include the provision of additional landscaping and business identification signage.

#### 4.3.1 Landscaping

Landscape Plans have been updated to:

- offset trees across the parking aisle;
- amend tree pits to 3.4m wide;
- incorporate structural tree soils to increase the available area under parking for root growth; and
- increase the diversity and numbers of shrub species;
- increase the diversity of trees and groundcovers.

These plans form **Appendix C2** of this RTS Report.

As the site has been classified as an inner protection area (IPA) within the Bushfire Protection Assessment (Appendix 13 of the EIS), tree planting responds to the Rural Fire Service (RFS) Planning for Bushfire Guidelines to ensure that separations of 2-5m between mature canopies can be achieved. Therefore, due to these requirements and the width of the available landscaping, trees are required to be planted in a row. The exception to this is on the bund, where staggered tree canopies are likely to touch, however shrubs are not placed under these areas and located some distance from the building.

This landscaping approach was approved by Travers Bushfire and Ecology, within their assessment of Geoscapes' landscaping plans.

To help mitigate and soften the building particularly from Mamre Road and receptors to the north, native species will be planted at regular intervals along the northern and eastern boundaries of 14 Distribution Drive, Orchard Hills – note, planting to the existing warehouse is to remain unchanged, as per SSD-9429 approval.

**Figure 4** and **Figure 5** show the extent of landscaping now proposed, in response to Council's submission.



## RESPONSE TO SUBMISSIONS REPORT

Proposed Industrial food manufacturing facility

2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

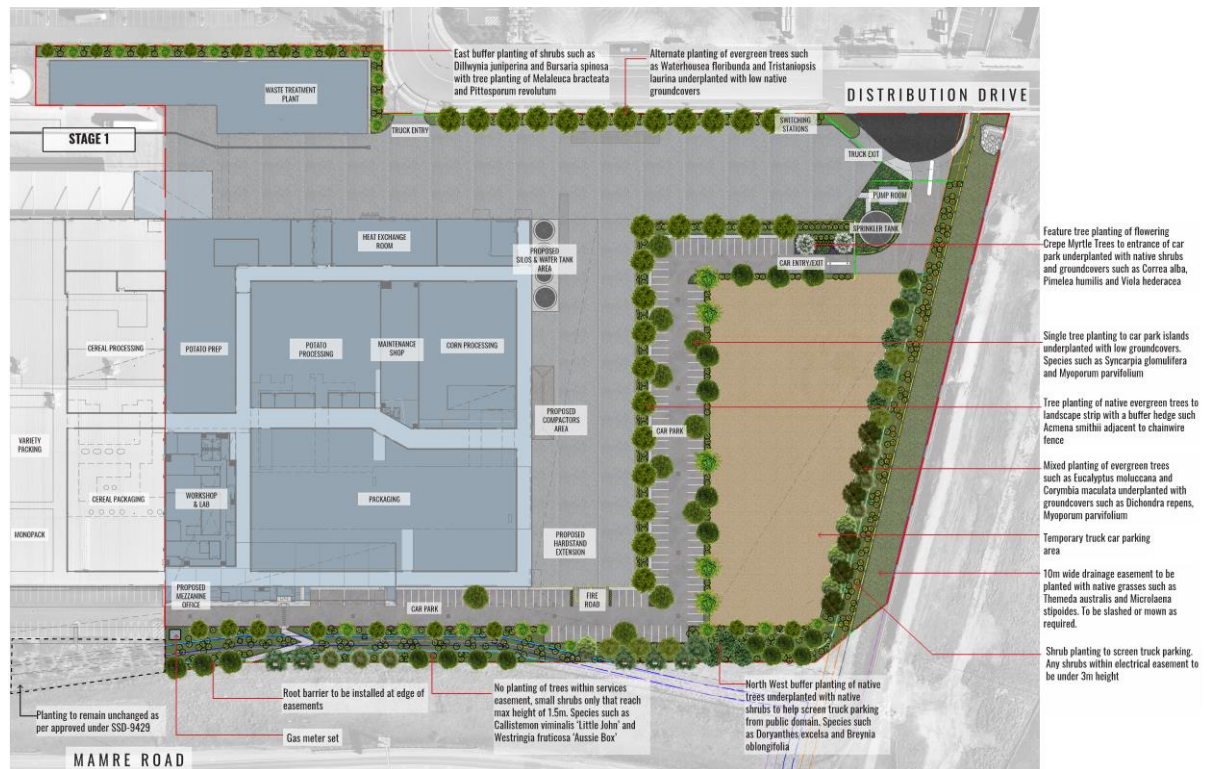


Figure 4 Updated Landscape Plan (Source: Geoscapes, 2021)

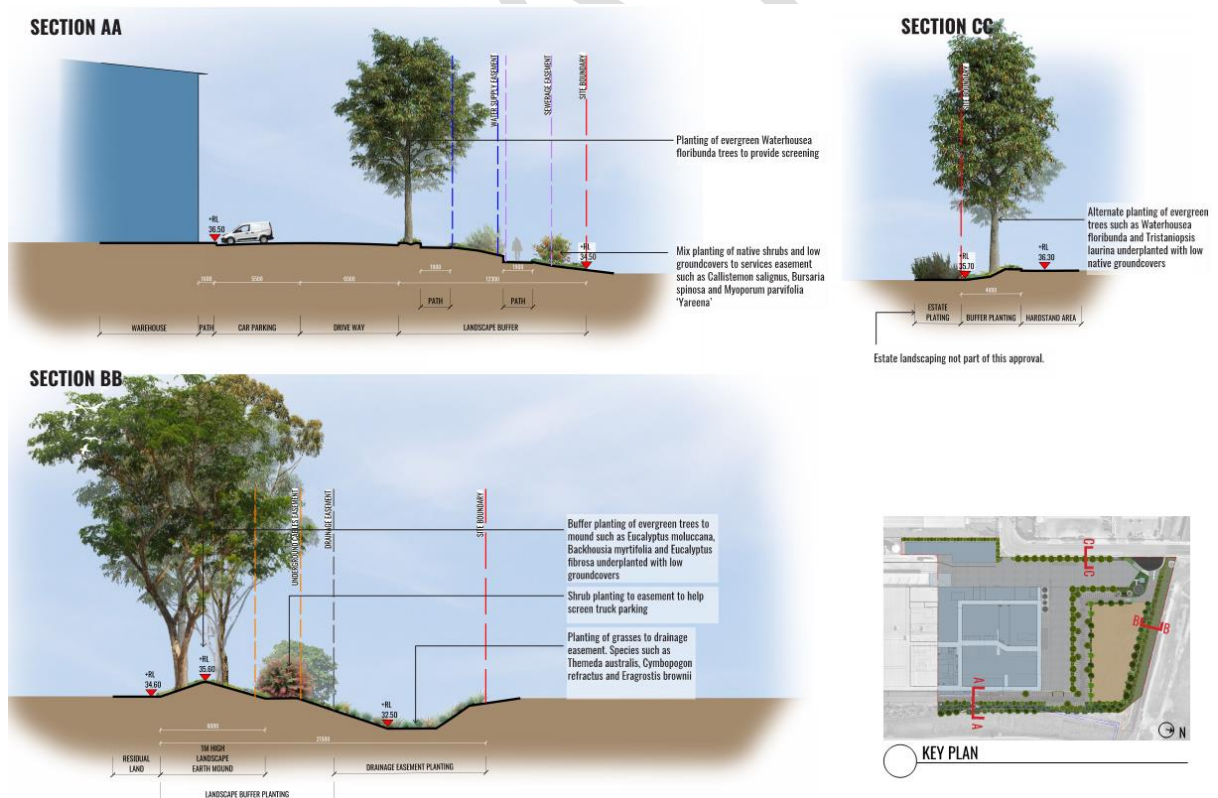


Figure 5 Updated Landscape Sections (Source: Geoscapes, 2021)



### 4.3.2 Signage

The proposal now includes the provision of business identification signage zones. As such, consideration and assessment against the *State Environmental Planning Policy No 64 – Advertising and Signage* (SEPP 64) is required.

The signage parameters for the proposed development are detailed in **TABLE 5**.

| TABLE 5: PROPOSED SIGNAGE DETAILS |                                |     |   |
|-----------------------------------|--------------------------------|-----|---|
| Sign Type                         | Dimensions<br>(width x height) | No. | Description   |
| Business identification sign      | 7.0m x 2.5m                    | 1   | Provisional wall sign located at the far northern extent of the eastern façade. |
| Business identification sign      | 6.0m x 2.2m                    | 1   | Provisional wall sign located at the far northern extent of the western façade. |

All proposed signage is located within the boundaries of the subject site.

Whilst the proposal seeks consent for provisional signage zones, the proposed signage will be consistent with existing SBA facility, being the company name and associated brands. **Figure 6** below shows the current signage context of the existing SBA warehouse facility. **Figure 7** below shows the intended content of the provisional signage zones. The SBA branding and imagery will be tailored to suite the allocated signage zones, as per the dimensions within **TABLE 5**.



**Figure 6** Context of existing SBA warehouse signage (Source: nettletontribe, 2020)



**Figure 7** Example Signage Content (Source: SBA, 2022)



Pursuant to Clause 8 of SEPP 64, a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:

- *that the signage is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and*
- *that the signage the subject of the application satisfies the assessment criteria specified in Schedule 1*

These matters are addressed in detail, within **TABLE 6**.

The aims and objectives of SEPP 64 are details as follows:

- (1) *This Policy aims:*
- (a) *to ensure that signage (including advertising):*
- (i) *is compatible with the desired amenity and visual character of an area, and*
  - (ii) *provides effective communication in suitable locations, and*
  - (iii) *is of high quality design and finish, and*
- (b) *to regulate signage (but not content) under Part 4 of the Act, and*
- (c) *to provide time-limited consents for the display of certain advertisements, and*
- (d) *to regulate the display of advertisements in transport corridors, and*
- (e) *to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.*
- (2) *This Policy does not regulate the content of signage and does not require consent for a change in the content of signage.*

The proposed development seeks consent for signage for the purposes of business identification, which is considered to meet the aims and objectives of SEPP 64 for the following reasons:

- It relates directly to the proposed use of the subject site and will subsequently enhance the viability of the future operations of the site.
- The proposed signage compatible with the proposed built form, exhibiting a similar scale and design to the proposed development.
- The proposed signage will positively contribute to the locality through high quality design, construction and finish.
- Considering the existing industrial precedent and the nature of the proposed development, the proposed signage will integrate with the existing built form, in terms of sitting, scale and design.

The proposed signage is considered compatible with the SEPP 64 aims and objectives.

Pursuant to SEPP 64, business identification signs are to be assessed under Schedule 1. The assessment criteria under Schedule 1 of SEPP 64 are addressed in **TABLE 6**.

| <b>TABLE 6: SEPP 64 ASSESSMENT CRITERIA</b>  |   |
|--|---|
| <b>Criteria</b>  | <b>Proposal Compliance</b>  |
| <b>1 Character of the area</b>   |   |
| <i>Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</i> | Yes, the proposed signage is compatible with the existing and desired future character of the subject site and other development within the immediate area. |





**TABLE 6: SEPP 64 ASSESSMENT CRITERIA**

| Criteria   | Proposal Compliance  |
|--|--|
| <i>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</i>   | Yes, as above.   |
| <b>2 Special areas</b>   |  |
| <i>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</i> | The proposed signage is considered consistent with the proposed built form and would not detract from the amenity or visual quality of the surrounding area.   |
| <b>3 Views and vistas</b>  |  |
| <i>Does the proposal obscure or compromise important views?</i>  | No, the proposed signage would be of a height and scale consistent with the built form on the subject site and would not disrupt any views or dominate views toward the site.  |
| <i>Does the proposal dominate the skyline and reduce the quality of vistas?</i>  | No, the proposed signage is considered of a reasonable scale and location on the building and will not be dominant on the skyline.   |
| <i>Does the proposal respect the viewing rights of other advertisers?</i>  | Yes, the proposed signage would not obstruct any other signage or advertising.   |
| <b>4 Streetscape, setting or landscape</b>   |  |
| <i>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</i>  | Yes, the proposed signage has been designed in respect of the proposed built form on the subject site to effectively identify the operations of the site. The proposed signage is compatible with the character of the site and its surrounds as detailed above. |
| <i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i>   | Yes, the proposed signage would visually define operations of the subject site and create a visually coherent built form.  |
| <i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i>   | Not applicable, the subject site does not contain any existing advertising.  |
| <i>Does the proposal screen unsightliness?</i>   | No, the proposed signage is not used as a visual screen or filter.   |
| <i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i>  | No, the proposed signage does not protrude above the proposed development.   |
| <i>Does the proposal require ongoing vegetation management?</i>  | No, the proposed signage would not require ongoing vegetation management.  |
| <b>5 Site and building</b>   |  |
| <i>Is the proposal compatible with the scale, proportion and other characteristics of the</i>  | Yes, the proposed signage is of a suitable scale and design for its intended purpose to effectively identify future operations of the subject site and would   |





**TABLE 6: SEPP 64 ASSESSMENT CRITERIA**

| Criteria   | Proposal Compliance   |
|--|---|
| <i>site or building, or both, on which the proposed signage is to be located?</i>  | integrate with the existing built form and façade design to achieve visual coherence.   |
| <i>Does the proposal respect important features of the site or building, or both?</i>  | Yes, the proposed signage does not obscure any important architectural features of the building.  |
| <i>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</i>   | Yes, the proposed signage has been integrated with the layout of the site so as not to obstruct any vehicle movements and achieve a positive visual outcome.  |
| <b>6 Associated devices and logos with advertisements and advertising structures</b>   |   |
| <i>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</i> | Not applicable.   |
| <b>7 Illumination</b>  |   |
| <i>Would illumination result in unacceptable glare?</i>  | No, illumination is not proposed.   |
| <i>Would illumination affect safety for pedestrians, vehicles or aircraft?</i>   | No, illumination is not proposed.   |
| <i>Would illumination detract from the amenity of any residence or other form of accommodation?</i>  | No, illumination is not proposed.   |
| <i>Can the intensity of the illumination be adjusted, if necessary?</i>  | No, illumination is not proposed.   |
| <i>Is the illumination subject to a curfew?</i>  | No, illumination is not proposed.   |
| <b>8 Safety</b>  |   |
| <i>Would the proposal reduce the safety for any public road?</i>   | The simplicity and scale of the proposed signage seeks to ensure that the safety of the public road is not compromised. The intent of the signage is for business identification purposes only.<br>The proposed signs would be fitted to the development walls and do not reduce the safety of any public road. |
| <i>Would the proposal reduce the safety for pedestrians or bicyclists?</i>   | No, the proposed signage would not obstruct any pedestrian or cycle routes or infrastructure and therefore would not negate the safety of pedestrians or cyclists.  |
| <i>Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</i>                                     | No, the proposed signage would not obscure any sightlines from public areas frequented by pedestrians. Nor would the proposed signage obstruct any vehicle sight lines from public roads.   |





## PART E PROJECT JUSTIFICATION

### 5.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise vacant landholding to a productive employment generating facility.

This RTS Report seeks to provide an updated justification and evaluation, as required, for the proposal as a whole

#### 5.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; the *Western City District Plan*; and the *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP). The proposal would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

In response to the operational needs of SBA at a regional and national scale, it has been determined that the proposed purpose-built facility is required to support the growth of the business and increasing demand for their products.

The proposed development would assist in providing new employment opportunities through the provision of a manufacturing facility, associated with adjoining warehouse and logistics land uses, to facilitate employment-generating development and economic growth of the Mamre West Precinct within the WSEA. The proposal will also contribute to greater productivity and a significant increase in jobs for the WSEA in the industrial and logistics sector.

The proposed development, for the purposes of a manufacturing facility is considered consistent with the strategic direction of both the *Western City District Plan*, published by the Greater Sydney Commission, and the WSA Plan, published by the Western Sydney Planning Partnership and the NSW Government. Additionally, the proposed development will further contribute to the growth of jobs in the WSEA; hence, contributing to the Western City District's economic growth.

Furthermore, the proposed development could support the growth of the existing sectors in the Western City District, such as logistics and freight, whilst promoting industry diversification; and would attract investment opportunities, ultimately fostering the growth of the wider Mamre Road area within the WSA as the economic catalyst of the Western Parkland City.

This proposal seeks to develop an industrial food manufacturing facility adjacent to the existing SBA distribution centre at Orchard Hills. Currently SBA manufactures food products at two separate facilities located in Blacktown and Smithfield, before transporting the finished goods to Orchard Hills distribution centre. The proposed development seeks to consolidate the two existing manufacturing facilities into one new facility adjacent to the distribution centre.

The driving factors for the project are to reduce production costs through:

- Elimination of finish product shuttle
- Reduction of loss of products
- Increased energy efficiency
- Reduced energy consumption





### **5.1.2 Demonstrates an Appropriate Use of a Permissible Development**

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible (given its contiguousness to other existing industrial and logistics hubs, particularly the existing SBA warehouse) response to the strategic goals and objectives of the whole region as set out in *A Metropolis of Three Cities – Greater Sydney Region Plan* and the *Western City District Plan*. These documents all envisage employment-generating land uses at this location.

The subject site is located within an establishing industrial area and is zoned IN1 General Industrial under WSEA SEPP. The proposed development will facilitate the use of the subject site for industry, which is consistent with the zoning and the surrounding context. The subject site, within an industrial area and proximity to major arterial roads, serves as being ideal for manufacturing and distribution purposes.

Accordingly, the subject site is considered to be suitable for the proposed development and is consistent with the aims and objectives of the IN1 General Industrial zone, in that it seeks to facilitate future employment generating development that responds to the characteristics of the land and is compatible with surrounding land uses.

The subject site is suitable for the size and scale of the development proposed and represents a quality outcome for otherwise unutilised industrial land.

In summary, the subject site is highly-suited to accommodate the intended new development based on the following factors:

- WSEA SEPP allows for the proposed development as a permissible use;
- The site is readily accessible via the regional road network;
- The proposed development is compatible with surrounding development and local context;
- The subject site can be serviced immediately and at no cost to Government;
- The proposed development causes minimal impact on the environment;
- The site will complement functions of the wider Mamre Road area; and
- The proposed built form is designed to mitigate any impacts on surrounding properties.

### **5.1.3 Minimises Environmental Impacts**

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set out in detail for mitigation. These measures have been revisited and updated where necessary, as addressed within **Appendix B** of this RTS Report.

### **5.1.4 Creates Compatibility with Surrounding Development**

The proposed development is compatible with existing land uses on adjacent lands, all of which provide very similar employment-generating functions. All are within the immediate vicinity of the proposed development. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

### **5.1.5 Delivers Ecologically Sustainable Development**

The principles of ESD as outlined in Clause 7(4) of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:





### **5.1.5.1 Precautionary Principle**

After careful assessment by both the project team and specialist consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

### **5.1.5.2 Inter-generational Equity**

The project team and specialist consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the subject site.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development. The proposed development would improve the status of the subject site and contribute to the economies of the region through both substantial investment and new employment, thereby improving the inter-generational equity.

### **5.1.5.3 Improved Valuation, Pricing and Incentive Mechanisms**

The proposed development would enable new cost efficiencies, through the consolidation of existing SBA manufacturing facilities of Smithfield and Blacktown. Such consolidation would improve logistics efficiencies, by removing the requirement for transfers between the existing facilities to the recently constructed SBA warehouse at 2 Distribution Drive, Orchard Hills.

The proposal also offers a total investment (including infrastructure and land) value of \$222,532,480.00 (excluding GST).

### **5.1.5.4 Environmental Management**

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air-quality, noise, waste and pollution impacts, through avoidance, better design and management. This is exemplified through the following measures, which would be implemented throughout both the construction and operational phases of the proposed development:

- acoustic reduction
- air emissions mitigation
- waste management control practices
- erosion-and-sediment control
- management of DGs

## **5.2 CONCLUSION**

Based on the findings of the original EIS and further matters considered as part of this RTS, it is concluded that the proposed development is consistent with the Objects of the EP&A Act, under Section 1.3, particularly the notion of promoting the orderly and economic development of the land.

The proposed development is considered a quality outcome for an otherwise vacant industrial site, which forms part of the WSEA. Additionally, in the promotion of employment-generating opportunities throughout the construction and operational phases, the proposed development further delivers on the rationale of full economic utilisation and proper and orderly development of the land for its intended purpose namely industrial and employment uses.





The proposed development is suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

- 1. Strategic and Statutory Context** – The proposal aligns with the strategic planning framework, namely *A Metropolis of Three Cities* and the *Western City District Plan*. Consistency is achieved through the provision of employment, activation of stagnant industrial land and implementation of sustainable development measures that contribute to create a new and leading-edge form of development.

In terms of the statutory context, the proposal is entirely consistent with the Objects of the EP&A Act. The appropriateness of the proposed development is also demonstrated through compliance with the WSEA SEPP in that it achieves the employment generating outcomes envisaged for the subject site with minimal impact on surrounding land uses.

- 2. Suitability of the Site** – The subject site is highly suitable for the proposed development, as it is directly adjacent to the newly constructed SBA warehouse and distribution centre. It also presents a suitable platform for development in that it is flat, is located within close proximity of key road infrastructure and has limited environmental constraints.
- 3. Community and Stakeholder Engagement** – The EIS and supporting reports have been prepared in accordance with the matters prescribed by the SEARs. A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development, which has continued through the RTS phase.
- 4. Noise and Vibration** – The updated NIA prepared by Renzo Tonin has quantified construction and operational noise emissions from the proposed development and has assessed noise at the nearest sensitive receivers. Subject to employing the recommendations of Renzo Tonin, it has been established that operation of the site is capable of complying with relevant EPA and Penrith City Council noise emission requirements.
- 5. Air Quality and Odour** – The updated AQIA prepared by Northstar Air Quality has assessed construction and operational air quality implications from the proposed development, with a range of mitigation measures recommended to ensure that short-term impacts associated with construction activities are minimised.

The operational phase impact assessment does not predict any non-compliance (exceedance) of the relevant impact assessment criteria at any identified receptor location. A range of management and control measures have been recommended including a recommendation for an emissions monitoring program to measure emissions at the Proposal site within three months of operating, and also to implement a series of additional controls to offer effective air quality management.

- 6. Traffic and Transport** – Sufficient access and parking arrangements are provided as part of the proposed development, ensuring that there would be no undue impact on the surrounding road network. Updated swept path analysis have been carried out by Ason Group to demonstrate the equitable access arrangements of the proposed development.
- 7. Urban Design and Visual Assessment** – As clearly demonstrated in the submitted Architectural Plans, Landscape Concept Plan and original Visual Impact Analysis the proposed development provides a suitable urban design outcome that reflects the existing locality.





- 8. Food safety** – The relevant food safety standards and requirements will be met and maintained.
- 9. Waste** – A Waste Management Plan has been provided, which considers construction and operational waste measures to be undertaken for the proposed development. All buildings have considered the provision for waste management areas to ensure the effective management and disposal of waste can occur.
- 10. Soils and Water** – Water reuse and rainwater harvesting has been considered for the proposed development. The stormwater design of the proposed manufacturing facility is in accordance with Penrith City Council's detention, water quality and flooding requirements as well as engineering best practice principles, hence it can be ensured that there will be minimal impact on the existing environment as a result of the proposed development.
- 11. Infrastructure Requirements** – The proposed development seeks to ensure that future planned infrastructure can be accommodated to support the growth of the area and beyond.
- 12. Fire and Incident Management** – The facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site. Consultation with FRNSW continue following development consent, by way of the FEBQ process prior to the issue of the relevant construction certificate.
- 13. Hazards and Risks** – The storage of DGs has been analysed, and 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.
- 14. Bushfire and Incident Management** – Bushfire risk is considered low. In addition, the new industrial manufacturing facility (within Lot 10) will provide compliance with the PBP 2019 requirements for water supply, access, landscaping and evacuation.
- 15. Ecologically Sustainable Development** – The proposed development maintains its intent to achieve a high Green Star Rating by applying ESD principles.
- 16. Biodiversity** – A BDAR waiver has been sought.
- 17. Planning agreement / Development contributions** – Satisfactory arrangements have been made to the provision of regional infrastructure and will be made to the necessary local infrastructure where required.

Given the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of WSEA SEPP, it is recommended that the proposed development, for the purposes of an industrial food manufacturing facility, be supported subject to relevant and reasonable conditions.





**APPENDIX A**  
**SUBMISSIONS**  
**REGISTER**



**SUBMISSIONS REGISTER**

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

| SSD-18204994 – SUBMISSIONS REGISTER |                          |  |   |
|-------------------------------------|--------------------------|--|---|
| Group                               | Name                     | Matters                                  | Addressed   |
| Public authorities                  | NSW DPE                  | Project description                      | Refer to <b>Section 3.1</b> , <b>Section 4.1</b> and <b>Section 4.1</b> of this RTS Report.   |
|                                     |                          | Residual land                            | Refer to <b>Section 3.1</b> and <b>Section 4.2.3.1</b> of this RTS Report.                    |
|                                     |                          | Construction materials                   | Refer to <b>Appendix C1</b> of this RTS Report.   |
|                                     |                          | Construction staging and timeframe       | Refer to <b>Appendix C7</b> of this RTS Report.   |
|                                     |                          | Site access and manoeuvrability          | Refer to <b>Section 3.1</b> and <b>Appendix C4</b> of this RTS Report.                        |
|                                     |                          | Architectural plans                      | Refer to <b>Appendix C1</b> of this RTS Report.   |
|                                     | NSW DPI Agriculture      | No concerns raised                       | N/A – no action required for DA.  |
|                                     | EES Group in the NSW DPE | Biodiversity assessment                  | Refer to <b>Section 3.1</b> of this RTS Report.   |
|                                     | Endeavour Energy         | Network capacity / connection and design | N/A – no action required for DA.  |
|                                     |                          | Bushfire                                 | N/A – no action required for DA.  |
|                                     |                          | SEPP 33                                  | Refer to <b>Section 3.1</b> of this RTS Report.   |
|                                     |                          | Earthing                                 | N/A – no action required for DA.  |
|                                     |                          | Prudent avoidance                        | N/A – no action required for DA.  |
|                                     |                          | Vegetation management                    | Refer to <b>Section 3.1</b> , <b>Section 4.3.1</b> and <b>Appendix C2</b> of this RTS Report. |
|                                     |                          | DBYD                                     | N/A – no action required for DA.  |
|                                     |                          | Demolition                               | N/A – no action required for DA.  |
|                                     |                          | Public safety and emergency contact      | N/A – no action required for DA.  |
|                                     |                          |  |   |
|                                     | EPA                      | EPL                                      | N/A – no action required for DA.  |
|                                     |                          | Noise and vibration                      | Refer to <b>Section 3.1</b> and <b>Appendix C5</b> of this RTS Report.                        |
|                                     |                          | Water                                    | N/A – no action required for DA.  |





**SUBMISSIONS REGISTER**

Proposed Industrial food manufacturing facility  
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SSD-18204994

| SSD-18204994 – SUBMISSIONS REGISTER |                      |  |  |
|-------------------------------------|----------------------|--|--|
| Group                               | Name                 | Matters  | Addressed  |
|                                     |                      | Air quality and odour                                  | Refer to <b>Section 3.1</b> and <b>Appendix C6</b> of this RTS Report.                           |
|                                     | FRNSW                | Fire safety  | Refer to <b>Section 3.1</b> of this RTS Report.  |
|                                     | Heritage NSW         | No concerns raised                                     | N/A – no action required for DA.   |
|                                     | TfNSW                | Transport assessment                                   | Refer to <b>Section 3.1</b> and <b>Appendix C4</b> of this RTS Report.                           |
|                                     |                      | Freight and heavy vehicle considerations               | Refer to <b>Section 3.1</b> and <b>Appendix C4</b> of this RTS Report.                           |
|                                     |                      | Mamre road corridor                                    | Refer to <b>Section 3.1</b> and <b>Appendix C4</b> of this RTS Report.                           |
|                                     |                      | Active transport considerations                        | N/A – no action required for DA.   |
|                                     |                      | Work place travel plan                                 | N/A – no action required for DA.   |
|                                     | Sydney Water         | Water Servicing  | N/A – no action required for DA.   |
|                                     |                      | Wastewater Servicing                                   | Refer to <b>Section 3.1</b> , <b>Section 4.2.6.6</b> and <b>Appendix C10</b> of this RTS Report. |
|                                     |                      | Integrated Water Cycle Management and Circular Economy | N/A – no action required for DA.   |
|                                     | Rural Fire Service   | No concerns raised                                     | N/A – no action required for DA.   |
| Councils                            | Penrith City Council | Distribution Drive turning head                        | Refer to <b>Section 3.1</b> of this RTS Report.  |
|                                     |                      | Car parking  | Refer to <b>Section 3.1</b> , <b>Section 4.3.1</b> and <b>Appendix C2</b> of this RTS Report.    |
|                                     |                      | Landscape planning                                     | Refer to <b>Section 3.1</b> , <b>Section 4.3.1</b> and <b>Appendix C2</b> of this RTS Report.    |
|                                     |                      | Advertising signage                                    | Refer to <b>Section 4.3.2</b> of this RTS Report.  |
|                                     |                      | Roads Act requirements                                 | N/A – no action required for DA.   |
|                                     |                      | Local flooding   | Refer to <b>Section 3.1</b> and <b>Appendix C3</b> of this RTS Report.                           |





**SUBMISSIONS REGISTER**

Proposed Industrial food manufacturing facility  
2 and 14 Distribution Drive, Orchard Hills (Lot 10 and 11 DP 271141)

SSD-18204994

| SSD-18204994 – SUBMISSIONS REGISTER |      |                               |   |
|-------------------------------------|------|-------------------------------|---|
| Group                               | Name | Matters                       | Addressed   |
|                                     |      | Perimeter fencing             | Refer to <b>Section 3.1</b> and <b>Appendix C3</b> of this RTS Report.                        |
|                                     |      | Filling of land               | N/A – no action required for DA.  |
|                                     |      | Environmental management      | Refer to <b>Section 3.1</b> and <b>Appendix C6</b> of this RTS Report.                        |
|                                     |      | Biodiversity                  | N/A – no action required for DA.  |
|                                     |      | Waterways                     | Refer to <b>Section 3.1</b> and <b>Appendix C3</b> of this RTS Report.                        |
|                                     |      | Landscape design              | Refer to <b>Section 3.1</b> , <b>Section 4.3.1</b> and <b>Appendix C2</b> of this RTS Report. |
|                                     |      | Building and certification    | N/A – no action required for DA.  |
|                                     |      | Public health and food safety | N/A – no action required for DA.  |
| Stakeholder Groups                  | N/A  | N/A                           | N/A   |
| Individuals                         | N/A  | N/A                           | N/A   |







## **APPENDIX B**

### **UPDATED MITIGATION MEASURES**



## PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT

|                        |   |
|------------------------|---|
| <b>By:</b>             | Snack Brands Australia  |
| <b>In relation to:</b> | State Significant Development Application (SSD-18204994)<br>For proposed Industrial food manufacturing facility |
| <b>Site:</b>           | 2 and 14 Distribution Drive, Orchard Hills<br>Lot 10 and 11 DP 271141   |

Snack Brands Australia (SBA), plan to undertake the construction and operation of the proposed Industrial food manufacturing facility, in accordance with the following subsections.

Below prescribes some of the terms and abbreviations used in this statement, including:

|                     |   |
|---------------------|---|
| <b>Approval</b>     | The Minister's approval of the project  |
| <b>BCA</b>          | Building Code of Australia  |
| <b>Council</b>      | Penrith City Council  |
| <b>DPE</b>          | Department of Planning, Industry and Environment                              |
| <b>EIS</b>          | Environmental Impact Statement  |
| <b>EP&amp;A Act</b> | <i>Environmental Planning and Assessment Act 1979</i>                         |
| <b>SBA</b>          | Snack Brands Australia  |
| <b>NCC</b>          | National Construction Code  |
| <b>Project</b>      | The proposed development as described in <b>Section 4.1</b> of the RTS Report |
| <b>Secretary</b>    | Secretary-General of the Department (or delegate)                             |
| <b>Subject site</b> | Land to which the project application applies                                 |
| <b>WorkCover</b>    | NSW WorkCover   |

### ADMINISTRATIVE COMMITMENTS

#### Commitment to Minimise Harm to the Environment

- AC1. SBA will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development.

#### Terms of Approval

- AC2. SBA will carry out the project generally in accordance with the:

- (a) Environmental Impact Statement;
- (b) RTS Report;
- (c) Drawings;
- (d) Management and Mitigation Measures;
- (e) Any Conditions of Approval.





**Occupation Certificate**

- AC3. SBA will ensure that Occupation Certificates are obtained prior to the occupation of the facilities.
- AC4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.
- AC5. SBA will ensure compliance with any reasonable requirement(s) of the Secretary of the DPE arising from the assessment of:
- (a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and
  - (b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

**Structural Adequacy**

- AC6. SBA will ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the NCC.

**Operation of Plant and Equipment**

- AC7. SBA will ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.

**Construction Environmental Management Plan**

- AC8. Prior to the commencement of construction, SBA will prepare a Construction Environmental Management Plan (CEMP) that addresses the following:
- (a) Air Quality;
  - (b) Noise;
  - (c) Waste Classification;
  - (d) Erosion and Sediment Control;
  - (e) Materials Management Plan; and
  - (f) Community Consultation and Complaints Handling.

**Monitoring of State of Roadways**

- AC9. SBA will monitor the state of roadways leading to and from the subject site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed.

**Waste Receipts**

- AC10. SBA will ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the subject site, be kept and maintained up to date at all times. Such records would be made available to authorised person upon request.

**Complaints Handling**



- AC11. SBA will prepare and implement an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.

**Consultation**

- AC12. SBA will prepare and implement a Community Consultation Strategy (CCS), to be implemented throughout the construction and operational phases of the project.

**SPECIFIC ENVIRONMENTAL COMMITMENTS****Air Quality**

- AQ1. Prior to commencement of works, SBA will develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the relevant regulatory bodies.
- AQ2. Prior to commencement of works, a construction air quality management plan will be developed (post approval) in line with the Air Quality and Odour Impact Assessment.
- AQ3. SBA will implement an emissions testing program in accordance with the requirements of an Environmental Protection Licence (EPL).
- AQ4. SBA will develop an Operational Environmental Management Plan (OEMP) to address air emissions (including odour).
- AQ5. SBA has an Environmental and Sustainability Policy ESN-001P that outlines commitment to Environmental compliance. SBA will accept and implement the recommendations as outlined in the Air Quality and Odour Impact Assessment for monitoring of performance.

**Noise and Vibration**

- NV1. During the construction phase, SBA will ensure that all recommendations of the Construction Noise and Vibration Management Plan are adopted and implemented.
- NV2. During site operations, SBA will ensure that:
- Corn delivery does not occur at the same time as potato delivery.
  - Forklifts are electric or gas, not diesel.
  - Waste water treatment plant will be located within an enclosed building.
  - Doors on the northern façade of the warehouse must be kept closed except as required for ingress/egress.
  - Heat exchanger room roller door on western façade must remain closed at night time.
  - Filling of corn silo to be limited to daytime only (7am – 6pm).

**Traffic and Transport**

- TT1. SBA will ensure that a Construction Traffic Management Plan (CTMP) is prepared and submitted to DPE. This plan will:
- (a) be submitted to the Secretary for approval prior to the commencement of construction;
  - (b) describe the traffic volumes and movements to occur during construction;
  - (c) detail proposed measures to minimise the impact of construction traffic on the surrounding network, including driver behaviour and vehicle maintenance; and,
  - (d) detail the procedures to be implemented in the event of a complaint from the public regarding construction traffic.
- TT2. The CTMP will be implemented throughout the construction cycle.





TT3. SBA will prepare a Workplace Travel Plan.

### **Aboriginal Cultural Heritage**

- AH1. All contractors undertaking earthworks on site will be briefed on the protection of Aboriginal heritage objects under the *National Parks and Wildlife Act 1974* and the penalties for damage to these items.
- AH2. If unforeseen Aboriginal objects are uncovered during construction the unexpected finds protocol will be followed. Work will cease in the area, and the NSW Office of Environment and Heritage will be informed.

### **Waste Management**

- WM1. During construction, SBA will implement the measures contained within the prepared Waste Management Plan. These are to be incorporated into the CEMP to be issued prior to commencement of construction.
- WM2. SBA will ensure that all waste generated on-site during construction and operation is classified in accordance with the *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of at facility that may lawfully accept the waste.

### **Dangerous Goods**

- DG1. SBA will reassess the site facility risk contours, in the form of a Final Hazard Analysis once the final design has been completed prior to construction of the DG related elements of the design.
- DG2. SBA will ensure the following documentation is prepared in accordance with the WHS Regulation 2017:
- A DGs Register, indicating the type of chemical, any notations that may be required from the risk assessment and the Safety Data Sheet for the chemical.
  - A Placard Schedule.
  - A Manifest.
  - A DG Risk Assessment of the storage and handling areas.
  - An Emergency Response Plan (ERP) and Emergency Services Information Package (ESIP).
  - A Hazardous Area Classification (HAC) and Hazardous Area Verification Dossier (HAVD).







## **APPENDIX C**

### **SUPPORTING INFORMATION**