NSW GOVERNMENT
Department of Planning

MAJOR PROJECT ASSESSMENT: Advance Metal Products Manufacturing Facility, Ingleburn

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

August 2006

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1. EXECUTIVE SUMMARY

Advance Metal Products (AMP) currently operates two metal manufacturing facilities at Ingleburn, in the Campbelltown Local Government Area. However, these facilities are currently operating at capacity.

AMP proposes to construct and operate a new metal manufacturing facility in the Ingleburn industrial area so that it can consolidate its existing operations on one site and provide for future growth.

The proposal involves the construction and operation of a large single storey warehouse (with an attached two storey administration building) and associated infrastructure such as car parking. AMP would import unformed sheet metal to the facility and produce metal products such as storage cabinets and metal casings.

The proposal has a capital investment value of $14 million, and would employ up to 160 people during operations.

The Department has assessed the environmental impacts of the proposal, and is satisfied that the proposal can comply with all the relevant environmental criteria, the site is suitable for the proposed development, and that the proposal is generally in the public interest. Consequently, it believes the proposal should be approved subject to conditions.

2. PROPOSED DEVELOPMENT

AMP currently operates two metal manufacturing facilities in the Ingleburn Industrial Area in the Campbelltown Local Government Area. However, these operations are currently operating at capacity.

To alleviate these capacity constraints, AMP proposes to construct and operate a new metal manufacturing facility in the Ingleburn Industrial Area (see Figure 1 for the location of the proposed site), and relocate its existing operations to the new facility.

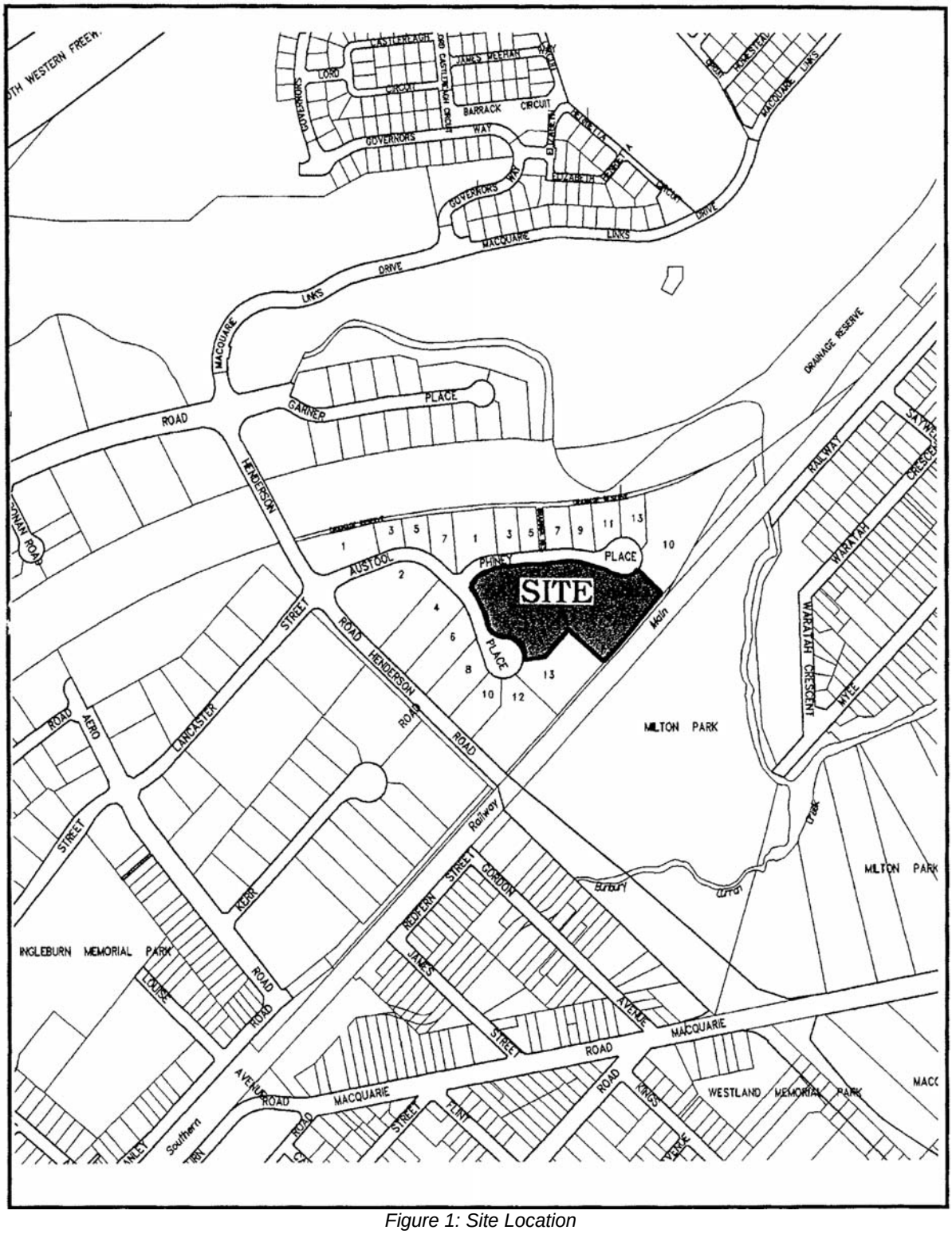

Figure 1: Site Location

The major components of the proposed facility are summarised in Table 1, and the general layout of the facility are shown in Figure 2.

Table 1: Major Components of the Proposal

Component	Description
Warehouse/factory	Construction of a single storey warehouse which would house the factory, powdercoating, packing and dispatch facilities. The warehouse would have a gross floor area of 14,555m². Finishes would comprise a masonry façade with metal deck roofing.
Administration office	Construction of a two storey office building attached to the warehouse. The office would have a gross floor area of 2,865m². Finishes would comprise a masonry façade with metal deck roofing.
Employee and visitor parking	170 at-grade parking spaces for employees and visitors along the southern side of the facility. This parking area would be separated from heavy vehicle movement areas.
Stormwater system	Stormwater collection for the entire site, feeding into the Council stormwater system.
Landscaping	Landscaping within the road reserve, setback area and around site perimeter.
Advertising	Business identification signage in the form of three pole signs and one flush wall sign.
Acoustic barrier	Construction of a 3.5m acoustic barrier along the eastern corner of the site.
Operations	The manufacturing facility would operate 24 hours per day, 7 days per week. However, heavy vehicle movements associated with the site would be restricted to between 7 am and 10 pm from Monday to Saturday.

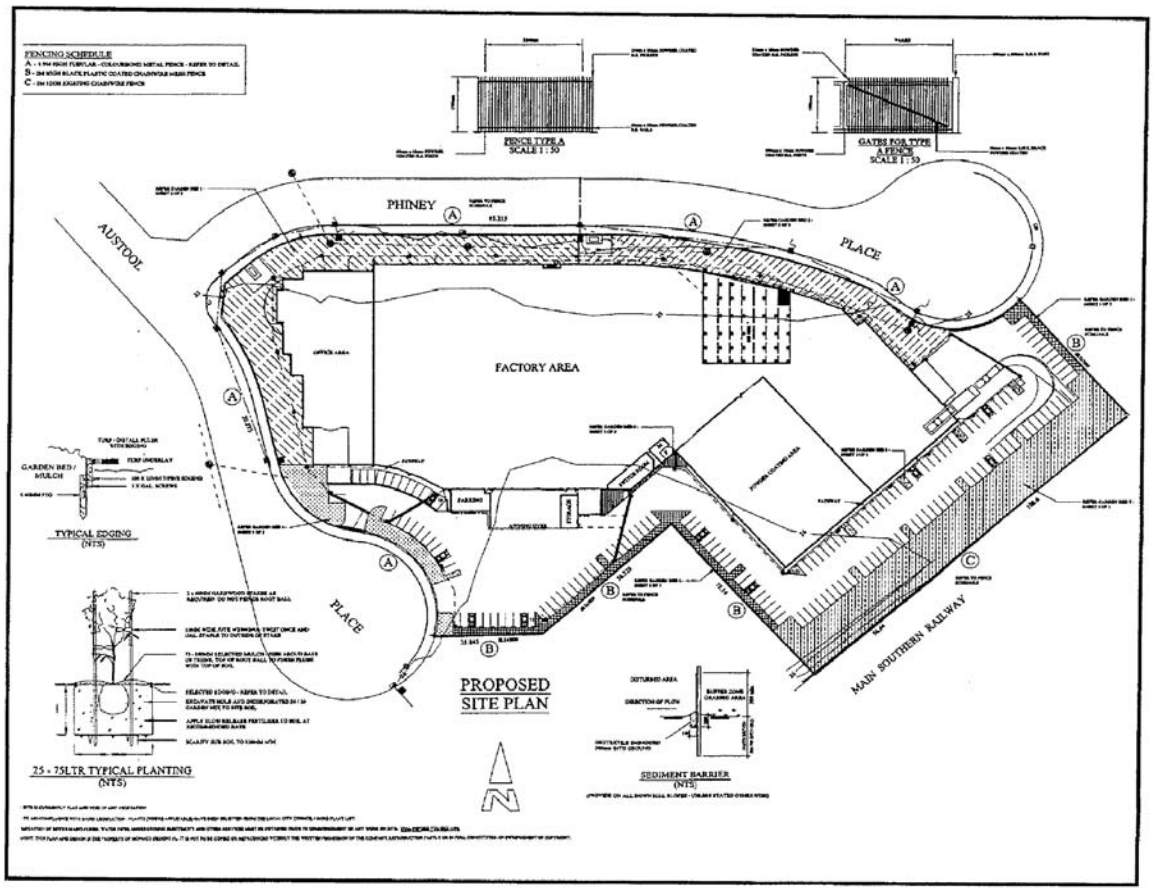

Figure 3: Project Site Layout

Essentially, AMP would import unformed metal to the site by trucks. The metal would be rolled, formed and powder-coated in the warehouse on the site to produce a range of metal products such as storage cabinets and metal casings. These products would then be transported to various retailers by truck.

The proposal has a capital investment value of $14 million, and would employ 40 workers during construction and up to 160 workers during operations.

The proposed site for the new facility is located on a vacant lot within an industrial precinct, and is surrounded on all boundaries by vacant industrial lots. Existing uses within the precinct include warehousing and industrial estates. The nearest residential area is over 300 metres to the east of the site. The residential premises in the vicinity of the site are shown in Figure 3.

Figure 3: Nearby residential areas

3. STATUTORY CONTEXT

3.1 Major Project

The proposal is classified as a major project under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it complies with the criteria in Schedule 1 of the *State Environmental Planning Policy (Major Projects) 2005* being a development for the purpose of a metal processing facility that would employ more than 100 people. Consequently, the Minister is the approval authority for the project.

3.2 Permissibility

The site is zoned 4(a) Industrial under the *Campbelltown (Urban Area) Local Environmental Plan 2002* (CLEP). The proposal is classified as an "industry", and is therefore permissible with development consent in this zone.

3.3 Exhibition

The environmental assessment of the proposal was made publicly available from 8 June 2006 until 10 July 2006, which satisfies the requirements for public consultation in Section 75H of the EP&A Act.

3.4 Environmental Planning Instruments

Under Section 75I(2) of the EP&A Act, the Director-General's report on the project is required to include a copy or reference to the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project.

The Department is generally satisfied that there are no SEPPs that substantially govern the carrying out of the project, but has assessed the proposal against the relevant provisions of the following planning instruments:

- *State Environmental Planning Policy No 11 – Traffic Generating Developments;*
- *State Environmental Planning Policy No 33 - Hazardous and Offensive Development;*
- *State Environmental Planning Policy No 55 - Remediation of Contaminated Land;*
- *State Environmental Planning Policy No 64 – Advertising and Signage.*

This assessment concludes that the proposal is not inconsistent with the aims, objectives and requirements of these instruments (refer to Appendix F).

4. ISSUES RAISED DURING CONSULTATION

During the exhibition period, the Department received 3 submissions on the proposal: 2 from public authorities (the Roads and Traffic Authority, and Campbelltown City Council), and 1 from a member of the general public.

A summary of the issues raised in submissions is provided below.

4.1 Noise

The submission from a member of the general public raised concerns that properties to the east and southeast of the site had not been considered in the Proponent's assessment of the noise impacts associated with the development. The submission also raised concern that a routine noise monitoring program for the development should be implemented.

4.2 Traffic Management

The RTA was satisfied that the proposal would not have a significant impact on the classified road network. However, it noted that the cumulative impact of industrial developments within the precinct could have a significant impact on the adjacent road network, and recommended that Council prepare a Section 94 plan to fund any necessary improvements to the local road network.

4.3 Air Quality

A member of the general public raised concerns regarding the filtration of factory air prior to its release to the environment, and whether this filtration system would capture all dust, fumes and odours associated with the development. The submission also requested that the Proponent be required to undertake routine air quality monitoring of the development.

The Department has assessed all of the issues raised in the submissions in Section 5 of this report.

5. ASSESSMENT OF ENVIRONMENTAL IMPACTS

5.1 Noise

Construction

The construction of the proposed development would take less than six months, and include the erection of the manufacturing facility, administration offices and acoustic fences, as well as the paving of most of the site.

While the vehicles and equipment used in these construction works would generate some noise. However, given that the site is in the middle of an industrial area and that the construction works are scheduled to take less than six months, the Department is satisfied that the proposal is unlikely to generate any adverse construction noise impacts.

Nevertheless, the Department believes AMP should be required to:

- Restrict construction work to between 7:00 am and 5:00 pm Monday to Saturday; and
- Prepare a construction noise management protocol to monitor and minimise noise as part of the Construction Environmental Management Plan for the project.

The Department is satisfied that these measures will ensure construction noise is adequately managed.

Operation

AMP proposes to fully enclose its manufacturing equipment in the new warehouse, which would attenuate the noise sources associated with the project. However, the unenclosed loading bay at the rear of the facility could generate occasional noise impacts during loading and unloading of materials.

Table 2 identifies the major sources of noise generated by on-site heavy vehicle activities.

Table 2: Noise emission levels from on-site heavy vehicles

Noise Source	**Sound Power Level dB(A) at 7m**
Reversing alarm	75
Truck manoeuvring	75
Air brakes	89
Door closing	75
Truck engine starting	72
Semi-trailer engine starting	89

To reduce the impact of these noise emissions from the site, AMP proposes to:

- install a 3.5 metre high acoustic barrier along the north-eastern and south-eastern boundaries of the site; and
- restrict heavy vehicle movements to and from the site to between 7am and 10pm from Monday to Saturday.

With these measures in place, the proposal is predicted to comply with the relevant noise criteria (see Table 3).

Table 3: Predicted Noise Levels with Mitigation Measures in Place

Period	**Location**	**DEC Criteria** ($L_{Aeq(15\ minute)}$)	**Predicted Noise Levels** ($L_{Aeq(15\ minute)}$)
Day	Nearest Residence	40 dB(A)	40 dB(A)
Evening	Nearest Residence	42 dB(A)	40 dB(A)
Night	Nearest Residence	37 dB(A)	<37 dB(A)

The public submission claimed that the potential noise impacts at some residences along Waratah Crescent (see Figure 1) were not fully assessed in the noise impact assessment. However, the Department believes that the noise assessment submitted by AMP provides a suitable representation of the potential noise impacts of the proposal on residences in the vicinity of Waratah Crescent, and has been carried out in accordance with the *NSW Industrial Noise Policy*.

While the Department is satisfied that the proposal can comply with the relevant noise criteria, it believes AMP should be required to:

- comply with the specified noise criteria;
- restrict heavy vehicle movements to and from the site to between 7am and 10 pm from Monday to Saturday; and
- carry out regular noise monitoring to ensure that the proposal is complying with the specified noise criteria.

Off-site Traffic Noise
Traffic generated by the proposed facility would access the Hume Highway without entering any residential roads. Consequently, the Department is satisfied that the proposal is unlikely to generate any significant traffic noise impacts.

5.2 Air Quality

The proposal involves a range of industrial processes. However, these processes are predicted to generate very few air emissions (see Table 4). In addition, these emissions would be confined to the proposed warehouse, and would be extracted from the building using standard filtration equipment. With these measures in place, the proposal is predicted to comply with all the relevant air quality.

Table 4: Air Emissions From Proposed Plant

MACHINERY	WASTE EMITTED
Guillotine	This machine does not produce any dust or fumes.
Turret Punches	These machines do not produce any dust or fumes.
Laser Machines	These machines create dust during the cutting operation process. The machines are equipped with their own dust collection and filtration units to segregate the air and dust. The machines are built to meet the European and Australian Standards.
Brake Presses	These machines do not create dust or fumes.
Inserting Machines	These machines do not create dust or fumes.
Drill Presses	These machines do not create dust of fumes.
Spotwelding	These machines do not create dust or significant fumes.
Welding	These machines create a small amount of fumes witch are extracted into filtration systems installed to Australian Standards.
Linish	These machines create a small amount of dust which are extracted into filtration systems installed to Australian Standards
Powder coating	The system does not create any dust or fumes but the process of applying powder to a surface is applied in a containment booth. The unit has an extraction system where the excess powder is recycled and reclaimed. From this point the recycled powder is mixed with fresh powder and the process is repeated. The system also has an advanced filtration unit to separate the air and powder. The system is designed to meet the European and Australian standards.

Nevertheless, the Department believes AMP should be required to:

- ensure that any air emissions generated by the proposed facility comply with the relevant air quality criteria; and
- and monitor these air emissions to ensure compliance.

5.3 Traffic Management

Construction
The volume of construction traffic is predicted to be low, and is not expected to cause any significant impacts on the surrounding road network. Nevertheless, the Department believes AMP should be required to prepare a traffic management plan as part of the Construction Environmental Management Plan for the site to ensure that construction traffic impacts are kept to a minimum.

Operation
The proposal is predicted to generate a maximum of 374 vehicle movements a day (see Table 5), however, these movements would be spread over at least 2 shifts.

Table 5: Vehicle Movements per day

Vehicle Type	Movements per day
Heavy vehicles	34
Light vehicles	340
Total	**374**

All of these vehicles would use the industrial area's road network to get to the entry/exit ramps of the Hume Highway, which is about 1 kilometre from the site. This means that no heavy vehicles and very few light vehicles would travel through any residential areas on the way to and from the proposed facility.

Consequently, the Department, Roads and Traffic Authority and Council are satisfied that the traffic impacts of the proposal would be minor, and that they can be easily accommodated by the existing road network.

Parking
The proposed facility would have 170 parking spaces. This is almost 100 spaces less than Council's parking DCP requires. However, given the mechanised nature of production and the shift-working arrangements for the project, the Department is satisfied that this should be more than sufficient to accommodate all the parking demand of the proposed facility.

Nevertheless, the Department believes AMP should be required to ensure that vehicles associated with the proposed facility do not park or queue on the road network outside the site.

5.4 Other Issues

The Department has assessed the other issues associated with the proposed facility, but considers these issues to be minor (see summary of this assessment in Table 6).

Table 6: Summary of Assessment of Minor Issues

Aspect	Comment
Water	• Water supply from Sydney Water. • Wastewater to sewer under trade waste agreement. • Stormwater plan for site included in EA, and is suitable for the site. • Standard erosion and sediment control measures to be implemented during construction.
Soil Contamination	• The site is suitable for industrial development.
Hazards	• Small amounts of hazardous material to be stored on site. • Amounts below the threshold for further assessment, and consequently unlikely to result in any off-site impacts. • To be stored on site in fully bunded area, and in accordance with the relevant Australian Standards.
Waste	• Construction waste to be minimised and recycled where possible. • Operational waste (1 tonne of scrap metal and paper/cardboard a week) to be stored on-site in special bins, before being removed for recycling.
Visual	• The site would be suitably landscaped. • Business identification signage would be installed on 3 pole signs and 1 flush wall sign. These signs would not be obtrusive.

6. CONCLUSION

The Department has assessed the merits of the proposal in accordance with the requirements of Clause 8B of the *Environmental Planning and Assessment Regulation 2000*.

This assessment has concluded that the proposal is unlikely to generate any significant environmental impacts, and should blend in well with the other buildings in the Ingleburn industrial area.

It has also concluded that the proposal would have positive economic benefits for the region in that it would employ over 150 workers, and allow AMP to consolidate its existing operations onto one site and increase its production capacity to accommodate future growth.

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

7. RECOMMENDATION

It is recommended that the Minister:

- consider this report;
- approve the project subject to the conditions; and
- sign the attached instrument.

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Executive Director, Major Project Assessments

Sam Haddad
Director-General