

Preliminary Environmental Assessment

For
Reckitt Benckiser

At
Westpark Industrial Estate
Erskine Park Drive, Erskine Park
(Lot 1 in DP1128233)

Prepared by
FDC Construction & Fitout Pty Ltd
22-24 Junction Street Forest Lodge NSW 2037
P:(02) 9566 2800 F: (02) 9566 2900
E:timb@fdcbuilding.com.au

April 2009

Revision: 0



Table of Contents

TABLE OF CONTENTS	2
1.0 INTRODUCTION	3
1.1 CONSULTANT TEAM	3
1.2 CONSULTATION	4
2.0 THE SITE.....	5
2.1 WESTPARK INDUSTRIAL ESTATE.....	5
2.2 BUILDING A2 (THE SITE).....	7
3.0 THE PROPOSAL	8
3.1 RECKITT BENCKISER	8
3.2 PROJECT BACKGROUND.....	9
3.3 SITE SELECTION.....	11
3.4 DEVELOPMENT DETAILS.....	11
3.5 FITOUT AND BUILDING MODIFICATION WORKS	14
4.0 PLANNING FRAMEWORK.....	16
4.1 NSW STATE PLAN	16
4.2 SYDNEY METROPOLITAN STRATEGY	16
4.3 STATE AND REGIONAL ENVIRONMENTAL PLANS.....	17
4.4 PENRITH LOCAL ENVIRONMENTAL PLAN 1994 (ERSKINE PARK EMPLOYMENT AREA).....	19
4.5 PENRITH DEVELOPMENT CONTROL PLAN 2006 (SECTION 6.14 ERSKINE PARK EMPLOYMENT AREA)	22
5.0 ENVIRONMENTAL RISK ANALYSIS.....	25
5.1 FLORA AND FAUNA.....	25
5.2 HAZARDS	25
5.3 TRAFFIC, ACCESS AND PARKING.....	25
5.4 HERITAGE AND ABORIGINAL ARCHAEOLOGY.....	26
5.5 STORMWATER DRAINAGE AND FLOODING.....	26
5.6 NOISE	26
5.7 VISUAL IMPACT	27
5.8 AIR QUALITY	27
5.9 UTILITIES	27
6.0 CONCLUSION	28
APPENDIX 1 – DOP CORRESPONDENCE.....	29
APPENDIX 2 – REDUCED ARCHITECTURAL PLAN.....	30
APPENDIX 3 – DRAFT PRELIMINARY HAZARD ANALYSIS	31

1.0 Introduction

This Preliminary Environmental Assessment has been prepared as part of a Major Project Application to the Department of Planning for the occupation of an existing building in Erskine Park by Reckitt Benckiser.

Reckitt Benckiser is one of the largest international manufacturers of branded products in household cleaning and health and personal care. This includes brands such as Nurofen, Mortein, Strepsils, and Dettol. A detailed description of Reckitt Benckiser is provided in Section 3 of this report.

Reckitt Benckiser (Australia) Pty Limited operates a manufacturing and distribution facility on Wharf Road in West Ryde, NSW. This facility currently provides accommodation for 600 employees in roles such as manufacturing, warehousing and distribution, administration, marketing and sales. Reckitt Benckiser intends to relocate the storage of finished products from their West Ryde storage facilities to Warehouse A2, in the Westpark Industrial Estate at Erskine Park. Manufacturing activities will continue to take place at the West Ryde facility.

Building A2 will be used for the receipt, storage and dispatch of products, typically including cosmetics, pharmaceutical and household goods. The storage of cosmetic, pharmaceutical and household goods will include Class 2.1 (aerosols), Class 2.1 subrisk 8, Class 3 and Class 4.1 materials. The proposed storage of these products will be in quantities exceeding that which constitutes the development as a Major Hazard Facility under the *Control of Major Hazard Facilities National Standard [NOHSC: 1014 (2002)]*. Therefore, Clause 10(3) of Schedule 1 in *State Environmental Planning Policy (Major Projects) 2005* is applicable.

The Director General of the Department of Planning has determined (refer Appendix 1) that *Part 3A of the Environmental Planning and Assessment Act 1979* (the Act) applies to this project. The purpose of this Major Project Application and Preliminary Environmental Assessment is to obtain the Director General's Requirements (DGR's) for the preparation of an Environmental Assessment. A detailed description of the proposal is provided in Section 3 of this report.

FDC Construction and Fitout Pty Ltd (FDC) is acting on behalf of Reckitt Benckiser to seek approval for the occupation of Building A2. Building A2 was built on a speculative basis by ING Industrial Fund as part of the Westpark Industrial Estate. ING continues to own the Estate and has provided land owners consent to this application. The proposed occupation of Building A2 involves some minor fitout works in order to accommodate Reckitt Benckiser's proposed use. These works are currently being undertaken on the basis of a development consent issued by Penrith City Council (DA09/0008).

1.1 Consultant Team

In preparation of this submission, the following consultants have provided input or relevant technical documents;

- Nettleton Tribe Architects (Architecture)
- Buckton Lysenko Consulting Engineers (Hydraulic Engineer)

- Moore Consulting and Engineering (Risk Consultant)

1.2 Consultation

In preparation of this application, Reckitt Benckiser, FDC Construction and Fitout and the abovementioned consultant team has consulted with a number of government authorities as follows:

- Department of Planning in relation to the applicability of Part 3A of the Act;
- Department of Planning (Major Hazard Unit) in relation to the application of SEPP 33 and other relevant hazard issues;
- NSW Fire Brigade in relation to fire protection of the facility;
- NSW Workcover in relation to workplace safety / Major Hazard Facility;
- Department of Environment and Climate Change (EPA licensing); and
- Penrith City Council in relation to the scope of the project and the relevant planning instruments, development control plans and guidelines.

2.0 The Site

For the purposes of this Preliminary Environmental Assessment, the site is defined as Building A2 within the Westpark Industrial Estate in Erskine Park. The following information provides a description of the Westpark Industrial Estate and then a detailed description of Building A2.

2.1 Westpark Industrial Estate

The Westpark Industrial Estate is located at 1 – 107 Erskine Park Road, Erskine Park and is legally described as Lot 1 in DP1128233. It is located within the Erskine Business Park, south of the St Clair residential area and north of Erskine Park Road. The site originally sat on the corner of Erskine Park Road and Mamre Road, but has since been subdivided into two lots to create a Biodiversity Corridor at the western end of the site. Figure 2.1 illustrates the location of the estate.

The site is zoned 4(e1) Employment Restricted by the *Penrith Local Environmental Plan (Erskine Park Employment Zone) 1994*. The estate is generally flat with an incline towards the east and north. The eastern portion of the site (Building C) is elevated above the level of Erskine Park Road. The estate does not contain any items of heritage significance. The estate is characterised by a large transmission line easement which runs along its northern boundary, providing a significant buffer from the St Clair residential area.

The estate has been progressively developed over recent years with the entirety of Building A and C completed (with associated car parking and landscaping). Penrith City Council has issued development consent for the construction of Building B (fronting Erskine Park Road) however construction is yet to begin on this part of the estate and therefore remains vacant. The existing buildings are currently occupied by the following tenants:

Building C

Building C1	Capral
Building C2	SCA Hygiene
Building C3	Kagans Logistics

Building A

Building A1	Kagan Logistics
Building A2	The site (to be Reckitt Benckiser)
Building A3	vacant

The activities on site typically involve warehouse and distribution of a wide range of goods and materials. Penrith City Council has assessed and approved the overall estate and each tenant prior to the occupation of the facility.

The estate is accessed via an estate road which connects with Erskine Park Road. The estate road is fully constructed, including a new signalised intersection (and road widening) which was designed and constructed in consultation with Penrith City Council and the Roads and Traffic Authority (RTA).

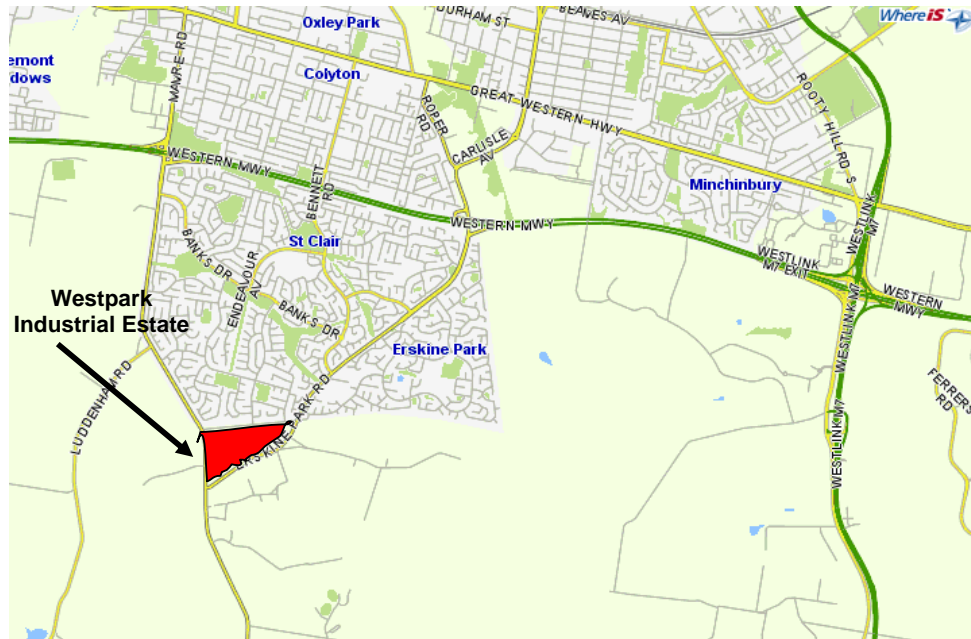


Figure 2.1: Site Location



Figure 2.2: Westpark Industrial Estate

2.2 Building A2 (the site)

Building A in the ING Westpark Industrial Estate was completed in 2008. The building has been separated into three separate tenancies. Building (tenancy) A1 is currently occupied by Kagans Logistics, a third party logistics operator, while building A2 and A3 are currently vacant.

Building A2 includes a warehouse (10,769m²) and an office (428m²) with 47 car spaces. The building faces south with frontage to the Estate Road. All activities associated with each building are focused along the southern side of the building ensuring that potential noise impacts and other disruptions are screened from the nearby residential area of St Clair to the north (over 170 metres from the building).

The building is 12.2 metres high at the ridge and has a pre-cast concrete wall along the northern elevation. Building A2 is separated by pre-cast concrete (fire rated) tenancy dividing walls. The southern elevation of Building A2 is characterised by eight (8) loading docks, four (4) which are recessed and four (4) at grade. The existing office has been designed over two levels incorporating contemporary materials (pre-finished metal cladding and glazing) to enhance its appearance within the Estate.

Figure 2.2 illustrates the location and layout of Building A2 in the context of the Westpark Industrial Estate. An architectural Plan (Drawing 3527_02) is included within Appendix 2 of this report. Figure 2.3 provides an indicative layout of Building A2 in regard to the proposed land use.

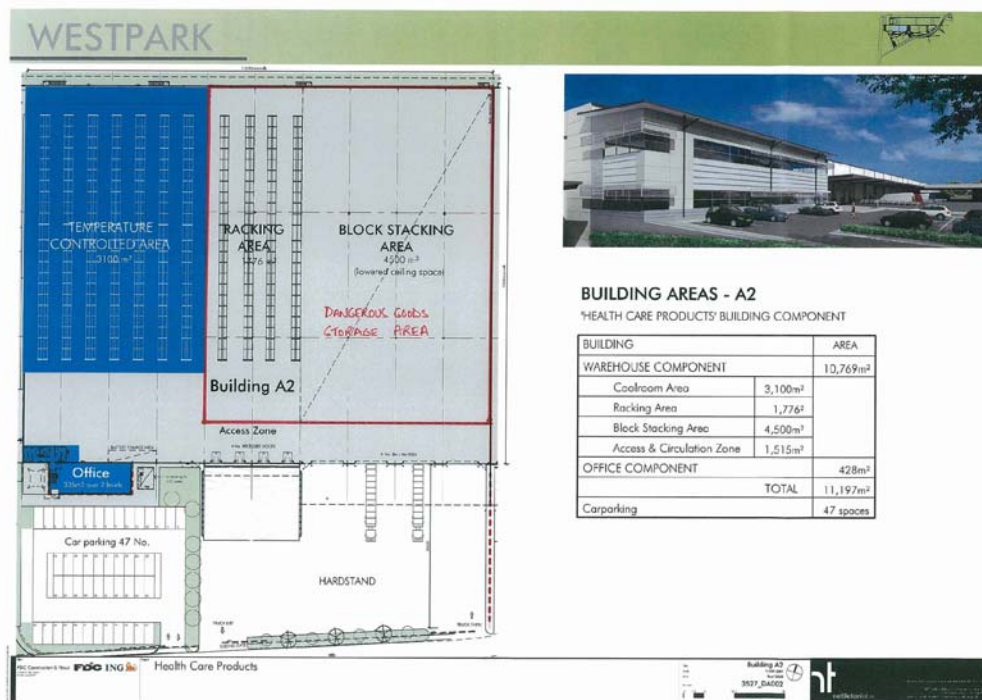


Figure 2.3: Building A2

3.0 The Proposal

The following section provides a detailed description of the proposed development.

3.1 Reckitt Benckiser

Reckitt Benckiser (Australia) Pty Limited is a wholly owned subsidiary of the UK-based Reckitt Benckiser plc, a manufacturer and marketer of branded products in household cleaning and health and personal care. Globally, Reckitt Benckiser sells over 9 million products on a daily basis and has annual revenue of \$12 billion (AUD). The company operates in 60 countries but is represented in over 180 countries. Over 22,000 people are employed worldwide.

Reckitt Benckiser's product range includes, but is not limited to, the following brands:



Reckitt Benckiser (Australia) Pty Limited (Reckitt Benckiser) operates a manufacturing and distribution facility on Wharf Road in West Ryde, NSW. West Ryde is the manufacturing, distribution and head office location for the Australia and New Zealand region and employs approximately 600 people in varying functions including; Marketing, Sales, Trade Marketing, Human Resources, Finance, Information Systems, Regulatory Affairs, Research and Development, Supply including manufacturing and warehousing.

The existing manufacturing site produces approximately 50 percent of the products supplied to Australia and New Zealand, including liquid, powder and aerosol products. The remaining product range is sourced from alternative Australian Manufactures and other Reckitt Benckiser International manufacturing centres for distribution throughout Australia and New Zealand.

Imported materials typically include packaging, raw materials, sub-assembly components and packaged finished goods. Imports arrive at Port Botany in Sydney and are delivered to the West Ryde facility by road.

Products are also sourced from a variety of different countries including China, Spain, France, UK, Hong-Kong, Italy, Korea, Mexico, Malaysia, Canada, Germany, New Zealand, Poland, Portugal, South Africa.

Port Botany is also utilised for exportation of goods to New Zealand, Pacific Islands and parts of Asia. Products are containerised and delivered to Port Botany by road transportation.

3.2 Project Background

A logistics plan for Reckitt Benckiser has recently been developed to improve the distribution efficiency of locally manufactured and imported products throughout Australia and the surrounding region. The logistics plan has also been developed in response to new Major Hazard Facility legislation which affects the operation of the current storage facility in West Ryde.

‘Project Pantry’ (the change in warehousing sites) was created to develop the planning processes required to establish a warehousing facility outside the West Ryde site that will accommodate the receipt, storage, picking, and despatch of packaged goods including various classes of dangerous goods, and healthcare products.

Reckitt Benckiser has identified a number of operational constraints at the West Ryde facility which include the following:

- Exceeded warehouse storage capacity on the site;
- Unable to consolidate current third party logistics (3PL) managed healthcare storage onto the site at West Ryde;
- The site does not conform to Therapeutic Goods Administration (TGA) requirements for the storage and handling of goods for Store Below 25 Degrees Celsius;
- The site layout for warehousing is disparate resulting in under utilised and ill-configured Material Handling to suit the current needs of the business;
- Inadequate warehouse storage space is available to accommodate smooth material flows and improve safe working areas;
- The current security arrangements are adequate for the products stored at the site however, they are considered sub optimal for the ability to consolidate drugs of high illicit value onto the site;
- Improvements were identified for the storage and handling of mixed packaged dangerous goods;
- The global insurance provider to Reckitt Benckiser had made recommendations for improvements in the fire protection system;

There were a number of key considerations that were established to help find and select an appropriate site for the proposed activity. These considerations are listed below:

- Finalise and determine the requirements for storage;
- Identify location factors including key transport routes, key and emerging industrial areas, staff travel times etc;
- Develop brief for market consideration including proposed lease terms and flexibility, in line with Reckitt Benckiser corporate guidelines;
- Conduct an initial property search and market commentary;
- Review logistics, transport and material handling issues as they impact the potential property;
- Determine if an existing facility could meet requirements considering availability of suitable properties based on types of product stored and legislative requirements for storage; and
- Reckitt Benckiser constraints in areas such as distance from West Ryde, distance to customer distribution centres, availability of workforce, applicability of EBA, and product transfer cost implications; and
- Confirm global insurance providers fire protection requirements for warehouse properties;

An operational review was also conducted to more comprehensively understand the operational needs of the business within a new facility. The review included the following aspects:

- A review and assessment of product inflows, storage, and outflows;
- Consideration of internal layout including traffic flows and materials handling equipment such as racking and conveyor system (if required),
- Productivities as a base for establishing additional materials handling equipment such as forklifts;
- Inventory management system needs and associated resources such as phone and data lines to support operations;
- Office and communication needs and staff amenity needs;
- Security and segregation needs for healthcare products;
- Staffing numbers; and
- The level of management and operational overheads;

Areas assessed also considered the cost and impact of building modifications to accommodate healthcare products, vehicle access needs, and local area constraints on vehicles (e.g. noise & Local Government restrictions).

3.3 Site Selection

Over 20 sites were considered and assessed by Reckitt Benckiser project team. The preferred site, Building A2 in the Westpark Industrial Estate in Erskine Park, had the following characteristics which were considered desirable:

- The warehouse space is 10,769m² and meets the storage requirements for the business;
- Office space is built outside warehouse footprint;
- There are suitable sunken docks available for shipping container unloading and loading and suitable floor level docks available under awnings to permit all weather loading and unloading;
- The hard stand area of the site will accommodate up to 10 parked trailers;
- ING Real Estate and FDC Construction and Fitout have developed a number of dangerous goods storage and handling facilities on the site and have a clear understanding of the requirements with the relevant authorities with NSW (in particular the NSW Fire Brigade and Penrith City Council);
- Fire rating of tenancy walls separates the facilities on either side of the warehouse reducing the upfront costs associated with moving into a warehouse;
- The fire sprinkler system is ESFR (Early Suppression Fast Response). This complies with the requirements for insurance and can be upgraded for the storage of various classes of dangerous goods;
- The facility is bunded and has a system which can store 11,000,000 litres of runoff and fire water in the event of an emergency;
- The site is well separated from nearby residential areas; and
- The site is within 20 kilometres of the major retail customers' facilities at Huntingwood, Silverwater and Minchinbury with good access to the M4 and M7 Motorways.

3.4 Development Details

Reckitt Benckiser proposes to occupy Building A2 within the Westpark Industrial Estate. The existing building consists of the following components:

Warehouse -	10,769m ² GLA
Office (2 levels) -	428m ² GLA
At grade docks -	4 loading docks
Recessed docks-	4 loading docks
Car parking -	47 car spaces

The warehouse will be a modern, clean environment for the receipt, storage and dispatch of product. Specific services to be conducted on the site include:

- Unloading and receipt of finished goods via trucks and shipping containers;
- Management of inventory in a racked and block stacked environment;
- Order fulfilment including picking and packing of finished orders to customers;
- Loading of transport vehicles;
- Management of product returns;
- Inspection of goods for QA purposes;
- Product Embellishment (e.g. stickering, custom packs assembly, etc);
- Rework / reconditioning for damages that occur through the supply chain;
- No manufacturing will occur at this facility;
- There is no decanting, filling or mixing of products to be undertaken at the warehouse.

3.4.1 Product Storage

The ranges of goods proposed to be stored within the facility include household cleaning items and healthcare items. The healthcare items (which include Schedule 2 & 3 products) shall require a licence to supply by wholesale poisons and/or restricted substances for therapeutics from the Department of Health and the TGA. Representative products are; Nurofen Tablets, Clearasil lotions, Strepsils lozenges and Lemsip sachets.

The storage of dangerous goods will include Class 2.1 (aerosols), Class 2.2, Class 3 and Class 4.1 materials. Other materials, including refrigerated goods (stored at or below 25 Deg C) will be stored within the warehouse. Representative Class 2.1 products are; Airwick Air Fresheners Aerosols, Mortein Ultra Low Allergenic Fly and Insect Killer and Mortein Fast Knockdown Fly and Insect Killer. Representative products for Class 3 products are; Brasso and Dettol Hand Sanitiser. A representative product for Class 4.1 is Clearasil Ultra Deep Pore Face Wipes.

The Dangerous Goods being stored on the site come from a range of locations including: West Ryde, NSW; Melbourne; UK; USA; China; Indonesia; and Portugal. The current mixed packaged dangerous goods proposed for this site are currently being stored at the West Ryde site. The manufacturing of the aerosols and some of the Class 3 goods will remain at the West Ryde site.

As indicated previously, Reckitt Benckiser also imports packaging materials, raw materials and sub assembly parts which shall continue to be stored at the West Ryde site. There is no intention for these goods to be stored at Erskine Park.

The proposed storage of Dangerous Goods is described within the Draft Preliminary Hazard Analysis attached within Appendix 3. This report provides a detailed assessment of proposed storage activities in the context of the relevant legislative requirements.

3.4.2 Incoming Goods

Incoming goods will be delivered via several different methods of transport as described below.

Shipping container deliveries will be via “drop trailers” and/or driver manned trailers or side loaders. Typical deliveries are turned around and dispatched within 1 hour of receipt at the site. Deliveries of the shipping containers to the site are proposed on a 24 hours per day basis, with the bulk of the deliveries expected between 3am and 5pm. Pickups of the empty shipping containers shall be between the same hours. Shipping containers will involve a combination of unloading processes which include hand unloading of products or forklift unloading of the product.

Deliveries from the West Ryde manufacturing site shall be via trucks. It is expected the bulk of the deliveries will occur between 5am and 7pm. The deliveries will include a range of products including both dangerous goods and ambient packaged product.

The expected frequency of deliveries for incoming goods:

- Containers 5 -10 per day
- Trucks 5 -10 per day

Product returns from customers (including incorrect deliveries, damages etc) shall be directed to the West Ryde site to undergo a quality inspection program and make an assessment to ensure the stock is suitable for storage in the warehouse (and eventual resale). It is anticipated that any damaged goods shall be re-conditioned within the Reckitt Benckiser manufacturing facilities at West Ryde prior to storage at Erskine Park.

3.4.3 Outgoing Goods

Outgoing deliveries will typically include semi trailers, however B-doubles will be used for deliveries to large customers such as Woolworths and Coles storage facilities. The approved transport companies will require access to the hard stand area on a 24 hour basis to collect drop trailers. The anticipated frequency of this work would be 1-2 times per day. It is expected that the loading process from the warehouse onto semi-trailers or B-doubles shall occur between 5am and 10pm.

It is expected that there will be some export containers loaded at the facility for transport by sea freight to overseas destinations (typically New Zealand and the Pacific Islands).

The expected frequency of deliveries for outgoing goods would include:

- Trucks and B-doubles 15 – 25 per day (less than full trucks are expected)
- Export Containers 5 – 10 per week

3.4.4 Hours of Operation and Staff

The facility shall operate 24 hours per day, 7 days per week. It is anticipated that the site will operate on a 3 shift basis, with each shift operating for 8 hours. There shall be a range of shift commencing times, typically the shifts shall commence at approximately 5am, 1pm and 9 pm.

The facility will employ up to 25 staff within the warehouse. Approximately 10 of these staff will be based fulltime in the office during standard business hours.

3.4.5 Equipment Used on Site

Material Handling Equipment includes electric battery operated forklifts and ride on movers. The facility will include pallet stretch wrap machines which are standard for most warehousing activities of this nature. Waste Storage Bins will include a number of 1.5m³ and one 160 litre bin within the warehouse. These will be collected by an appropriate waste contractor as outlined in the attached Waste Management Plan.

3.4.6 Waste

The waste generated on the site will include; general industrial waste (including glass, paper, liquids), packing materials in the containers (including foam and cardboard), stretch wrap of the pallets (including sticky tape and plastic) and general waste from the site (including glass, paper & food waste). As the site is non-manufacturing, typically the bulk of the waste shall be generated from re-palletising and wrapping of the pallets.

Goods shall be disposed of in accordance to the specific Product Safety Data Sheets available and are typically disposed at an approved waste disposal facility. Any spills shall be contained and disposed of in accordance with the Product safety data sheets and current legislation. No on-site waste treatment facilities will be used. Storage bins shall be provided for waste storage (1.5m³ bins) and recycling (160L bins).

3.4.7 Security

The warehouse shall fully electronically alarmed with 24/7 monitoring by an external connection to the Reckitt Benckiser West Ryde site. The West Ryde site is manned by the internal security team. There shall be closed circuit television installed at the warehouse and access to the warehouse areas will be restricted at all times. The building management system and fire protection systems shall be integrated into the security monitoring to control lights, alarms and alerts. There shall be regular security patrols on site in addition to the remote monitoring.

3.5 Fitout and Building Modification Works

The proposed non dangerous goods land use and fitout works were approved by Penrith City Council as part of DA09/0008. This approval related to the following works:

3.5.1 Temperature Control Area

As indicated on the attached architectural plans (Drawing No. 3270_114), a small forklift battery charging area is proposed adjacent to the office (within the warehouse). This area will be line marked for easy recognition by staff.

The proposed temperature control area will be constructed internally and will be fully insulated with cool room panels. The area will be used to store health care products that must be kept at a particular temperature such as Nurofen Tablets, Clearasil lotions, Strepsils lozenges and Lemsip sachets. This structure will not be visible outside of the building and will therefore have minimal impact on the local

environment. A small enclosure for plant equipment will be constructed for refrigeration equipment adjacent to the area along the northern elevation (at ground level). This will result in minimal visual or noise impacts given the size and location of the proposed refrigeration equipment in the context of residential properties to the north.

3.5.2 Storage Racking

As indicated on Drawing No. 3270_114, Reckitt Benckiser requires the installation of product racking within the warehouse. This racking has been designed in accordance with the relevant Building Code of Australia (BCA) requirements with regard to location and height and is standard for most warehouse and distribution tenants. Racking will not be visible from outside the proposed building and will therefore not result in any significant visual impacts on or surrounding the site. The proposed buildings were designed with the intent of accommodating warehousing tenants and the proposed racking will help facilitate this activity.

3.5.3 Lowered Ceiling

A lowered ceiling is proposed over the proposed block stacking area as part of the requirements for storing dangerous goods.

3.5.4 Fire Rated Wall Extension

Although Building A2 was constructed with appropriate fire rating between tenancies, the nature of the proposed use requires the extension of the western tenancy wall outside of the building footprint by approximately 5 metres. This will occur on the southern elevation to ensure that there is an appropriate level of fire separation between tenancy A2 and A3.

4.0 Planning Framework

The following section provides a summary of the relevant policy and legislation pertaining to the site and proposed development.

4.1 NSW State Plan

The NSW State Plan was developed by the NSW State Government to set directions for NSW. It establishes key visions and sets goals across a broad range of issues relevant to the state.

Chapter 5 is most relevant to the proposal as it provides objectives for achieving growth and prosperity across NSW. Priority Area 1 relates to increased business investment which is to be achieved by cutting red tape and maintaining and investing in infrastructure. The plan makes a commitment that 'being open for investment' requires supporting large and small businesses. It also describes the importance of the private sector's role in maintaining and creating highly productive jobs to underpin the State's ability to realise higher standards of living for all people.

Reckitt Benckiser (Australia) Pty Limited is a large company providing employment for approximately 600 people within the Sydney Metropolitan Area. The proposed occupation of Building A2 represents an important move by the company to enhance the compliance and efficiency of current operations within NSW. The proposed development will contribute to the ongoing growth of the company and will strengthen their ability to maintain and create jobs within the Sydney Metropolitan Region. The State Plan provides the policy context for the State Government to support and assist a company such as Reckitt Benckiser.

4.2 Sydney Metropolitan Strategy

The Sydney Metropolitan Strategy was developed in 2005 by the Department of Planning to establish a vision for Sydney over the next 25 years. The Strategy provides a framework for growth and development throughout the region on the basis of key areas such as employment and economy, housing, transport, environment etc.

The Strategy identifies the Western Sydney Employment Hub as an important location for employment generation and economic development. The strategic location of the Western Sydney Employment Hub, close to the intersection of the M7 and M4 Motorway, provides excellent access for the transportation of goods to and from major ports, other states and to customers. The location also provides employment opportunities within close proximity to the large workforce living in Western Sydney.

Building A2 was selected by Reckitt Benckiser for its proximity to major transportation corridors. This will allow the transportation of goods to and from the site from the existing manufacturing facility in West Ryde and from Port Botany. It also provides good access to major customers such as Woolworths and Coles. The proposed warehouse and distribution activity is consistent with the objectives of the Strategy by providing employment and economic development opportunities within the region. The proposed use is consistent with current zoning and with proposed future land use zones (proposed amendments to State Environmental Planning Policy 59).

State Environmental Planning Policy 59 (Western Sydney Employment Hub) provides the statutory framework for development in this area. This policy is described in more detail below.

4.3 State and Regional Environmental Plans

The following state and regional environmental plans are relevant to the proposal:

- State Environmental Planning Policy (Major Projects) 2005;
- State Environmental Planning Policy 33 (Hazardous and Offensive Development);
- State Environmental Planning Policy No. 59 (Western Sydney Employment Hub)

4.3.1 State Environmental Planning Policy (Major Projects) 2005

State Environmental Planning Policy (Major Projects) 2005 provides state wide provisions for identifying important projects and critical infrastructure which require assessment and approval by the Minister for Planning subject to the provisions of Part 3A of the *Environmental Planning and Assessment Act 1979*.

Development listed in Schedule 1 of the Major Project SEPP, is typically considered to be development to which Part 3A applies. Clause 10 in Schedule 1 refers to 'Chemical, manufacturing and related industries'. In particular, Clause 10(3) describes that,

Development for the purpose of the manufacture, storage or use of dangerous goods in such quantities that constitute the development as a major hazard facility under the Control of Major Hazard Facilities National Standard [NOHSC: 1014 (2002)]

The proposed facility will store dangerous goods in quantities that constitute the development as a Major Hazard Facility as outlined within Section 3.2 of the Preliminary Hazard Analysis (PHA).

On this basis, a letter was sent to the Department of Planning on 25 March 2009, requesting that an opinion be formed as to whether the project could be defined as a major project under Part 3A of the Act. The Director General of the Department of Planning has determined that the proposal is a kind that is described in Schedule 1 of the SEPP (refer to Appendix 1).

4.3.2 State Environmental Planning Policy 33 (Hazardous and Offensive Development)

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33) provides definitions and assessment criteria for hazardous and offensive development throughout NSW. Potentially hazardous and offensive development is defined below:

Potentially Hazardous industry means a development for the purposes of any industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on

the existing or likely future development on other land, would pose a significant risk in relation to the locality:

- (a) to human health, life or property, or*
- (b) to the biophysical environment,*

and includes a hazardous industry and a hazardous storage establishment.

Potentially Offensive industry means a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land) to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.

The quantities of dangerous goods stored at the warehouse exceed the threshold limits established for SEPP 33 which require the preparation of a Preliminary Hazard Analysis. A Draft Preliminary Hazard Analysis (PHA) has been prepared by Moore Consulting and Engineering and is attached for review. A summary of the PHA findings is provided below:

The methodology used for this PHA established that the risks associated with the proposed development were low. The determining features of the low risk levels observed were:

The proposed activities for the receipt storage and distribution of ethanol were examined against the risk criteria in DOP Risk Criteria from Land Use Safety Planning – HIPAP No.4. It was found that the development did not exceed any established criteria for individual, societal or bio-physical risk or increase the level of risk associated with the existing facilities.

The risks associated with the proposed activities, being low, would not significantly contribute to the risks associated with the existing activities. This does not imply that there are no risks to surrounding land uses from the existing activities, but that the contribution to risks from the proposed activities does not increase the risks significantly above those risks for existing activities.

There are two (2) existing facilities, located on the industrial estate that store dangerous goods that could contribute the risks associated with the surrounding land use. These facilities are:

- Warehouse A1 and
- Warehouse C3/C4.

These warehouses were examined in conjunction with Warehouse A2 to establish if the cumulative risk on the surround land uses. The cumulative effects of the three (3) warehouses were examined against the risk criteria in DOP Risk Criteria from Land Use Safety Planning – HIPAP No.4. It was found that the development did not exceed any established criteria for individual, societal or bio-physical risk.

4.3.3 State Environmental Planning Policy No. 59 (Western Sydney Employment Hub)

State Environmental Planning Policy No. 59 (Western Sydney Employment Hub) (SEPP 59) provides a co-ordinated framework of statutory guidelines for development within an area defined as the Western Sydney Employment Hub. The Western Sydney Employment Hub currently includes significant areas surrounding the Prospect Reservoir (including Eastern Creek) and incorporates the Local Government Areas of Holroyd, Fairfield and Blacktown. The key objectives of the policy include:

- rezones certain land for development;
- facilitates a co-ordinated planning and development effort across the region (and across Council boundaries)
- drives economic development and employment generation by facilitating appropriate industrial development within a strategically important location in the context of the Sydney Metropolitan Area;

SEPP 59 has recently been reviewed and will likely incorporate the Erskine Employment Area in the near future. This is an important progression in the context of the Sydney Metropolitan Plan given that the Erskine Park Employment Area forms a significant and logical part of the overall Western Sydney Employment Hub. This is particularly relevant on the basis of plans to extend Lenore Drive through Eastern Creek to provide direct access to the M7 Motorway.

The revised SEPP 59, once gazetted, will rezone the site from its current 4(e1) Employment Restricted Zone to a standardised industrial zone. This will have little effect in regard to the proposed development. The proposed development is however consistent with the objectives of SEPP 59 as it results in economic development and creates employment opportunities within the region.

4.4 Penrith Local Environmental Plan 1994 (Erskine Park Employment Area)

The Penrith *Local Environmental Plan 1994 (Erskine Park Employment Area)* provides the statutory planning framework for the Erskine Park Employment Area. The site is zoned 4(e1)(Employment Restricted Zone).

The proposed development involves warehousing and distribution activities involving dangerous goods. 'Offensive or hazardous storage establishments' are prohibited within the 4(e1)(Employment Restricted Zone) as in most industrial areas throughout NSW. However, the provisions of SEPP 33 override the LEP by providing a clear and consistent definition for hazardous or offensive facilities, whereby such activities are considered permissible if they are undertaken in accordance with relevant legislation.

The objectives of the 4(e1)(Employment Restricted Zone) include:

Table 4.1: 4(e1)(Employment Restricted Zone)

Zone Objectives	Response
<i>(a) to prohibit certain development which is likely to have an adverse environmental effect on the amenity of adjoining localities; and</i>	The proposed development is unlikely to result in any significant impacts for the local area. Although 24 hour operation is proposed, possible noise impacts have a low likelihood given the location and positioning of the existing building which will help to maintain a reasonable level of amenity for adjoining residential areas. Warehousing and distribution activities typically result in less environmental impacts when compared to other forms of industrial activities.
<i>(b) to promote development which does not have an adverse environmental effect on the adjoining residential and rural communities arising from air, noise or other pollution; and</i>	The proposed land use is considered appropriate for this locality when compared to other industrial activities. It results in minimal noise and air quality impacts as described in Section 5 of this report. The PHA considers the likely implications of a hazardous storage facility and concludes that the proposed facility will present minimal risks to the surrounding environment.
<i>(c) to permit retail activities which are:</i> <i>(i) compatible with the concept of the employment area; and</i> <i>(ii) unlikely to prejudice the viability of existing business centres, or are primarily intended to service persons working in the Erskine Park Employment Area; and</i>	No retail activities are proposed as part of this land use or building.
<i>(d) to permit office development of a type which:</i> <i>(i) would not be readily located in a traditional business zone; and</i> <i>(ii) would be unlikely to prejudice the viability of existing business centres; and</i>	The proposed office area is ancillary to the proposed warehouse and distribution land use. The office would not normally be located separately from the main use and would not prejudice the viability of any existing business centres.
<i>(e) to permit development for the purposes of recreation facilities, child care centres and community facilities in association with, or independent of, other permitted development to serve</i>	The proposed development involves an industrial activity.

Zone Objectives	Response
<i>the needs of the workforce of the Area and the adjoining residential and rural communities; and</i>	
<i>(f) to prohibit development of land for any purpose if, as a result of carrying out the development, there will be direct vehicular access between that land and either Erskine Park Road or Mamre Road; and</i>	No direct access to either Erskine Park Road or Mamre Road is available from the site.
<i>(g) to promote development of land with frontage to Mamre Road and Erskine Park Road if the buildings or works resulting from the carrying out of the development will, by their architectural and landscape design, enhance the rural scenic character of those roads and their roles as gateways to the City of Penrith.</i>	The proposed development does not front Erskine Park Road or Mamre Road.

Table 4.2 identifies and responds to specific clauses within the LEP that relate to the proposed development.

Table 4.2: LEP Compliance Table

Clause	Response	Compliance
Clause 10: <i>Environmental Considerations</i>	The proposed development will take place on a site that is appropriately zoned for industrial development. Other industrial development has been and continues to be constructed as part of the broader development of the Erskine Park Employment Area. Building A2 was designed and constructed to minimise potential environmental impacts. These measures are described in Section 5.	✓
Clause 11: <i>Efficiency Considerations</i>	Building A2 has been designed in accordance with the requirements of Part J of the Building Code of Australia (BCA).	✓
Clause 13: <i>Staging Plan for Provision of Services</i>	Services are provided to the site.	✓
Clause 14: <i>Provision of Services</i>	Services are provided to the site.	✓
Clause 15: <i>Drainage</i>	Drainage has been designed and constructed in accordance with	✓

Clause	Response	Compliance
	relevant Penrith City Council engineering standards.	
Clause 16: <i>Advertising</i>	The proposal does not involve any signage.	✓
Clause 17: <i>Tree Preservation</i>	No trees will be removed as part of this application.	✓
Clause 18: <i>Flood Liable Land</i>	The subject site is not flood liable land.	✓
Clause 20: <i>Retailing in Employment Zones</i>	The proposed development comprises a warehouse and distribution facility. Direct retailing activities do not form part of the planned use for this site.	✓
Clause 21: <i>Office Premises in Zone No.4(e)</i>	The proposed development incorporates an existing ancillary office for the administrative activities as part of the proposed use.	✓
Clause 24: <i>Transmission Easement</i>	The proposal does not include any development on the transmission easement.	✓
Clause 28: <i>Development along Particular Roads</i>	No direct vehicular access is proposed to Erskine Park Road. The proposed development will be accessed from the Estate Road.	✓

4.5 Penrith Development Control Plan 2006 (Section 6.14 Erskine Park Employment Area)

The Erskine Park Employment Area Development Control Plan (DCP) provides the design requirements for development in the Erskine Park Employment Area. The following section assesses the proposed development against the relevant principles of the DCP.

The majority of planning controls contained within the DCP relate to new development. Given that the proposed activity will take place within an existing building, these planning controls are not relevant. However, Section 6 relates to Environmental Quality and is applicable to the proposed development.

4.5.1 Noise Pollution (Section 6.1)

The proposed land use will generate some noise impacts associated with traffic movements to and from the loading bays along the southern elevation of the existing building. These noise impacts are typical of any warehouse and distribution activity and were considered by Penrith City Council during the assessment of the original Development Application for the building.

As described in Section 3.4, 24 hour 7 day per week operation is proposed. Deliveries of the shipping containers to the site are proposed on a 24 hour per day basis, with the bulk of the deliveries expected anywhere between 3am and 5pm. Deliveries from the West Ryde manufacturing site shall be via trucks and are expected between 5am and 7pm. It is expected that the loading process for outbound journeys (from the warehouse onto semi-trailers or B-doubles) shall occur between 5am and 10pm. Although approval is sought for 24 hour operation, it remains likely that the bulk of activities will occur during daylight hours.

The key mitigation measures which address the potential for noise impacts involve the design and location of Building A2. It was designed to ensure that all noise generated by tenants would be limited to the southern elevation so that the building provides its own noise buffer to residential properties to the north. The distance between the building and the rear boundary of residential properties (to the north) also serves to minimise the potential for noise impacts. The proposed level of noise generation is not unlike surrounding land uses on the Westpark Industrial Estate or within the Erskine Business Park.

4.5.2 Waste Management (Section 6.2)

The waste generated on the site will include; general industrial waste (including glass, paper, liquids), packing materials in the containers (including foam and cardboard), stretch wrap of the pallets (including sticky tape and plastic) and general waste from the site (including glass, paper & food waste). As the site is non-manufacturing, typically the bulk of the waste shall be generated from re-palletising and wrapping of the pallets.

Goods shall be disposed of in accordance to the specific Product Safety Data Sheets available and are typically disposed of at an approved waste disposal facility. Any spills shall be contained and disposed of in accordance with the Product safety data sheets and current legislation. No on-site waste treatment facilities will be used. Storage bins shall be provided for waste storage (1.5m³ bins) and recycling (160L bins).

4.5.3 Soil Erosion and Sediment Control (Section 6.3)

The proposed development will have little impact in regard to soil erosion and sediment control because the site is already developed. No earthworks are proposed as part of this proposal.

4.5.4 Air Pollution (Section 6.4)

The proposed development will generate very few air quality emissions as a result of the proposed warehouse and distribution activity. Air quality impacts will largely be generated by heavy vehicles travelling to and from the site. This is typical of any activity of a similar nature.

4.5.5 Storage, Transportation and /or Processing of Chemical Substances (Section 6.5)

The DCP requires the submission of detailed information outlining a proposed activity involving the storage and transportation of chemical substances. This Preliminary Environmental Assessment and the more comprehensive Environmental Assessment will provide an adequate level of information to address this Section of the DCP. An assessment will be undertaken to examine the products and quantities stored on site, and the method and route of transportation.

4.5.6 Stormwater Pollution Control (Section 6.6)

The existing stormwater system on site was designed by Buckton Lysenko Consulting Engineers. This system incorporates significant storage capacity of stormwater runoff which will provide an appropriate level of risk management and with regard to the proposed storage of dangerous goods. The relationship between the proposed activity and the stormwater system is described within the Preliminary Hazard Analysis. The existing system was one of the key reasons for Reckitt Benckiser in selecting this site as the preferred location.

4.5.7 Trading / Operating Hours of Premises (Section 6.9)

The DCP indicates that hours of operation for premises involved in any type of employment generating activity shall be dealt with on a merits basis. In undertaking a merits based assessment, the consent authority is to have regard for the potential impacts on amenity for adjoining residential areas.

Twenty four (24) hour / 7 day operation is proposed which is consistent with other approved land uses on site. This is considered appropriate given the nature of the site, the location of existing buildings and the distance between the site and the nearest residential properties.

5.0 Environmental Risk Analysis

The following section provides an environmental risk analysis to identify and consider potential environmental impacts that may result from the proposed land use. As this application relates to the occupancy of an existing building, there is an expectation that fewer environmental issues will require analysis (compared to a proposal for a new building). An explanation has also been provided as to how key issues might be considered as part of the Environmental Assessment.

5.1 Flora and Fauna

The proposed land use will take place within an existing building. No clearing is proposed as part of this proposal. It is unlikely that any flora and fauna impacts will be generated by the proposed occupation by Reckitt Benckiser. The existing Biodiversity Corridor to the west of Building A will not be affected or compromised by the proposed occupation.

It is anticipated that no further investigation will be required as part of the environmental assessment process.

5.2 Hazards

A draft Preliminary Hazard Analysis has been prepared by Moore Consulting and Engineering and is attached in Appendix 3. This report provides a comprehensive analysis of the proposed storage of dangerous goods on site. The report concludes the following:

The risks associated with the proposed activities, being low, would not significantly contribute to the risks associated with the existing activities. This does not imply that there are no risks to surrounding land uses from the existing activities, but that the contribution to risks from the proposed activities does not increase the risks significantly above those risks for existing activities.

Preliminary feedback is requested from the Department in regard to this document so that a final document can be prepared and submitted as part of the Environmental Assessment.

5.3 Traffic, Access and Parking

The proposed land use will involve the transportation of dangerous goods to and from the site. Although the proposed activity will generate a level of traffic well within the RTA guidelines for traffic generation, the nature of the proposed activity (dangerous goods storage) requires further analysis.

In accordance with State Environmental Planning Policy No. 33 (Hazardous or Offensive Development) and the Penrith DCP 2006 (Section 6.14 Erskine Park Employment Area) a traffic analysis will be undertaken to examine necessary transportation routes. This will be undertaken by an appropriately qualified traffic consultant and will be submitted as part of the Environmental Assessment report.

It is considered that the existing access and provision of parking is suitable in the context of the proposed occupant. The proposed site and Estate Road was designed to accommodate semi-trailer and B-Double access and was assessed by Penrith City Council as part of previous Development Applications. Provision of car parking was also undertaken on the basis of Council's DCP requirements and the RTA's standard guidelines. It is therefore not considered necessary to undertake further analysis of these aspects as part of the Environmental Assessment report.

5.4 Heritage and Aboriginal Archaeology

The proposed land use will take place within an existing building. No earthworks or land clearing is proposed as part of this proposal. The site does not contain any items of aboriginal or European heritage significance. It is therefore not considered necessary to undertake further analysis of this aspect as part of the Environmental Assessment report.

5.5 Stormwater Drainage and Flooding

The proposed land use will take place within an existing building which is connected to an existing stormwater system. The site is not flood affected. These aspects were all assessed by Penrith City Council as part of previous Development Applications in relation to building work. It is therefore not considered necessary to undertake further analysis of this aspect as part of the Environmental Assessment report.

5.6 Noise

The proposed land use will generate some noise impacts associated with traffic movements to and from the loading bays along the southern elevation of the existing building. These noise impacts are typical of any warehouse and distribution activity and were considered by Penrith City Council during the assessment of the original Development Application for the building.

As described in Section 3.4, 24 hour 7 day per week operation is proposed. Although approval is sought for 24 hour operation, it remains likely that the bulk of activity will occur during daylight hours.

The key mitigation measures which address the potential for noise impacts involve the design and location of Building A2. It was designed to ensure that all noise generated by tenants would be limited to the southern elevation so that the building provides its own noise buffer to residential properties to the north. The distance between the building and the rear boundary of residential properties (to the north) also serves to minimise the potential for noise impacts. The proposed level of noise generation is not unlike surrounding land uses on the Westpark Industrial Estate or within the Erskine Business Park which have and continue to be approved by Penrith City Council.

It is therefore not considered necessary to undertake further analysis of this aspect as part of the Environmental Assessment report.

5.7 Visual Impact

The proposed land use will take place within an existing building which was approved by Penrith City Council. No changes are proposed to the external facade of the building as part of this proposal.

No signage is proposed as part of this proposal. It is therefore not considered necessary to undertake further analysis of this aspect as part of the Environmental Assessment report.

5.8 Air Quality

The proposed development will generate very few air quality emissions as a result of the proposed warehouse and distribution activity. Air quality impacts will largely be generated by heavy vehicles travelling to and from the site. This is typical of any activity of a similar nature and formed part of Penrith City Council's original assessment. The proposed storage of dangerous goods will not affect the air quality of the surrounding environment. It is therefore not considered necessary to undertake further analysis of this aspect as part of the Environmental Assessment report.

5.9 Utilities

Building A2 is serviced by all required utilise and infrastructure to operate the proposed facility. This includes, water, sewer, power and communications infrastructure which are standard requirements for most industrial sites within the Sydney Metropolitan Area. It is therefore not considered necessary to undertake further analysis of this aspect as part of the Environmental Assessment report.

6.0 Conclusion

The proposed occupation of Building A2 by Reckitt Benckiser represents an important move by the company to enhance the compliance and efficiency of current operations within NSW. The proposal to relocate product storage functions from an existing facility within West Ryde to a contemporary warehouse facility in Erskine Park is sound. The proposal is consistent with the NSW State Plan and the Sydney Metropolitan Strategy by allowing an existing business to develop and expand (within NSW) in a strategically important location (Western Sydney Employment Hub), specifically designated to attract economic development and employment opportunities.

The proposed warehouse and distribution activities are consistent with the intended use of the Westpark Industrial Estate as originally approved by Penrith City Council. The proposed storage of dangerous goods can be accommodated without generating impacts above that considered appropriate by the relevant legislation. A Preliminary Hazard Analysis has been prepared to address these issues in detail.

FDC trusts that the information provided within this Preliminary Environmental Assessment provides the Department with sufficient information upon which to base a preliminary assessment of issues.

The environmental and legislative issues listed within this report will be discussed in detail in the future Environmental Assessment report. This information will be supplemented by any further information requirements nominated by the Director General which will form the basis of the Department's response to this preliminary assessment.



Appendix 1 – DoP Correspondence



Appendix 2 – Reduced Architectural Plan



SITE AREAS	
site area (transmission easement) (conservation area)	38.84 Ha (14.16 Ha) (5.90 Ha)
developable area	17.07Ha
proposed for whole of the site	1:0.265
proposed for developable area	1:0.62
total landscape area	22.76 Ha

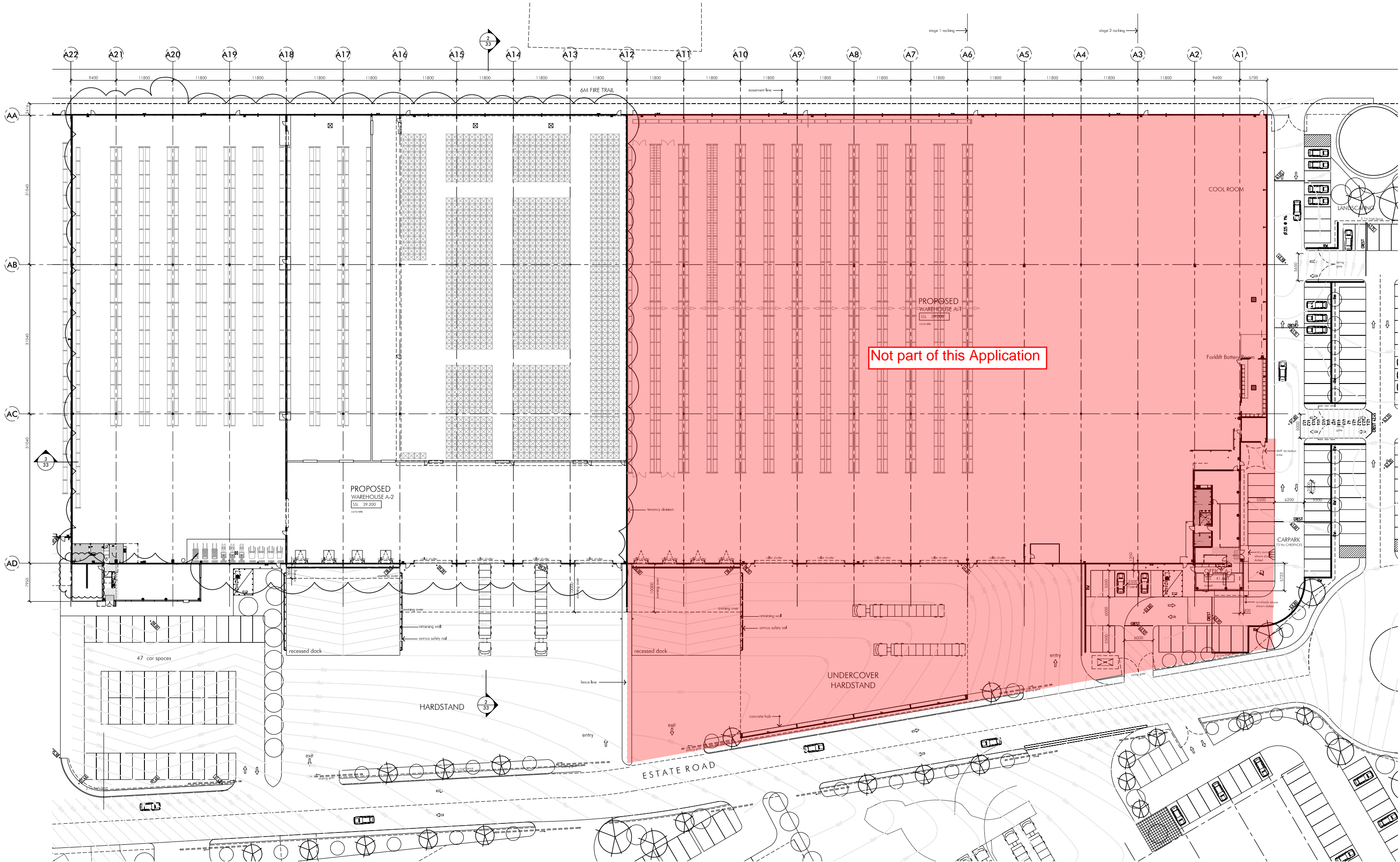
BUILDING AREAS				
building	a	b	c	total
warehouse	34762	29787	37900	102449
office	1000	1500	1280	3780
cafe	-	-	180	180
Total	35762	31287	39360	106409

building	a	b	c	total
Hardstand	8825	8189	11475	28489

CARSPACES				
building	a	b	c	total
warehouse 1 per 100 Msq (Erskine Park DCP)	347	298	379	
office 1 per 40 Msq (Erskine Park DCP)	25	38	32	
cafe 10 spaces + 1 space/20m2 retail floor space (Erskine Park DCP)	-	-	20	
Total Required (Erskine Park DCP)	372	336	431	1139

building	a	b	c	total
warehouse 1 per 300 Msq (RTA Guidelines)	116	100	126	
office 1 per 40 Msq (RTA Guidelines)	4	38	32	
cafe 10 spaces + 1 space/20m2 retail floor space (Erskine Park DCP)	-	-	20	
Total Required (RTA Guidelines)	120	138	178	436

Total Provided	221	218	224	663
----------------	-----	-----	-----	-----



Scale: 1:250@A0
Date: June 08
Number: 3270_014-B

FDC Construction & Fitout

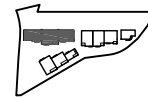
FDC

Project

WESTPARK
INDUSTRIAL ESTATE

No 474-536 Mamre Rd Erskine Park
Lot 3&4 DP559086, Lot 7 DP238969

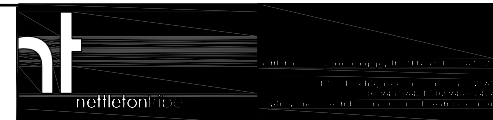
Issue	Description	Date	By
A	Development Application	12 July 2007	
B	Section 95 Application	16.06.08	
C	Section 95 Application	23.02.09	
	A2 warehouse layout updated,		
	external perimeter wall added.		



Scale
0 5 10
25 50m

Bldg A1 & A2 - Ground
1:250@A0
June 08
3270_014-B

© copyright nettleton 2008. All rights reserved.





Appendix 3 – Draft Preliminary Hazard Analysis
