

16 November 2021

David Koppers
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

Dear Mr Koppers,

SSD-17352813 - Huntingwood Processing Facility Expansion - Submission

I write on behalf of Goodman, the owners of Bungarribee Industrial Estate at 6 Brabham Drive, Eastern Creek (the Estate). The Estate is located immediately to the west of the proposed Huntingwood Processing Facility Expansion (SSD-17352813) at 65 Huntingwood Drive, Huntingwood (Fig.1).



Figure 1 - Location of the Huntingwood Processing Facility and Bungarribee Industrial Estate

Goodman Group

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Considering the proximity of the proposed development to the Estate, Goodman is concerned about potential environmental impacts, particularly air quality, the proposal may have on the working environment and amenity for customers of the Estate, which include:

- Amazon
- Blackmores
- BOC
- Central Heal
- Linfox
- Beaumont Tiles
- Metcash
- Toll IPEC

It is noted the site is zoned 'IN2 – Light Industrial', and that 'Light industry' is defined as:

*“a building or place used to carry out an industrial activity that does not interfere with the amenity of the neighbourhood by reason of noise, vibration, **smell, fumes, smoke, vapour, steam**, soot, ash, dust, waste water, waste products, grit or oil, or otherwise”*

'General Industries' including manufacturing, is not an expressly permitted use in IN2 – Light Industrial zoned land, particularly if the environmental impacts resulting from this use would interfere with the amenity of the neighbourhood. Such uses would be more appropriately placed on land zoned IN1 – General Industrial or IN3 – Heavy Industrial. More detailed assessment is required to confirm the proposal does not result in unacceptable impacts to the surrounds.

We have reviewed the air quality assessment included with proposal and highlight the following shortcomings:

1. **Failure to assess impacts at sensitive receptor locations as defined in the NSW Approved Methods.**
 - It is agreed that whilst commercial and industrial uses surrounding the Arnott's facility, including the Estate, are considered sensitive receptors, it's noted the sensitivity is less than for residential premises for amenity impacts.
 - The differences in sensitivity should have been reflected in the SLR risk-based assessment, however these receptors were omitted from the assessment entirely. To provide certainty and comfort to surrounding users, including the customers of the Estate, best practice would be to complete assessment of impacts during construction and operation for all receptors.
2. **Failure to utilise any quantitative assessment methods.**
 - It is agreed that the qualitative, risk-based approach used in the assessment is appropriate for construction impacts, and to some extent for odour impacts, an entirely qualitative approach for operational impacts is only appropriate for low-risk industries where no suitable emission data are available. However, a quantitative assessment could have been completed for the proposal based on measurements conducted at the existing facility, which would have satisfied the requirement to complete an assessment in accordance with the EPA's *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (Approved Methods).
 - With respect to other air pollutants, the assessment outcome relies mostly on qualitative assessment of the scale of the operation being low risk. Completing a quantitative assessment of the existing operation could have been completed with little effort. This assessment could have been based on the emission values reported to the NPI, and as

presented in Table 4 of the Air Quality Assessment (AQA) or based on any stack sampling that has been completed for the existing facility.

- While we acknowledge the lack of design data for the proposed extension as challenging and preventing SLR from quantitatively assessing this extension, sufficient information would have been readily available for SLR to complete quantitative assessment for the existing facility and at the very least use these outcomes to inform the qualitative assessment of the proposal. If greater design data is required to enable appropriate air quality assessment to be undertaken, the proposal design should be advanced to enable this data to be ascertained to ensure acceptable environmental impact assessment can be undertaken.
- We note that emission rates reported to the NPI for some pollutants are high, and would warrant discussion and assessment in the , including ammonia (NH3).

The flaw of the AQA for the proposal is that it has not provided evidence or discussion to a reasonable standard which would allow the extent of the impacts to be understood at the Estate and other surrounding uses.

In order to confirm the proposal will not result in an unacceptable nuisance impacts (i.e. odour) or health impacts (products of combustion, ammonia), the following information is requested to be provided:

1. The AQA should be updated to include assessment of impacts at all sensitive receptor locations as defined in the NSW Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales. These include any location 'where people are likely to **work**', including the Estate.
2. The AQA should be updated to include quantitative assessment tasks, including a Level 1 or Level 2 dispersion modelling assessment in accordance with the Approved Methods. At a minimum, this assessment should be carried out for the existing facility, and be based upon emission estimates as reported to the NPI, existing stack sampling data and/or supplementary stack sampling data as required. If ventilation design information is available, then emission values for the existing facility should be used as estimates for emissions from the proposed facility.

We thank you for your consideration of the above and look forward to hearing from you. For any questions, please call the undersigned on (02) 9230 7225.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Guy Smith', with a stylized flourish at the end.

Guy Smith
Head of Planning