Proposed Food Production Facility Moorebank, NSW

Major Project
Part 3A - NSW Environmental Planning and Assessment Act, 1979

Preliminary Environmental Assessment

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Contents

Preliminary Environmental Assessment Report Prepared by Goodman Fielder with advice from Total Construction and Walsh Consulting. See below for contact details.

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1. Introduction

1.1 Purpose

This preliminary environmental assessment provides:

- A description of the proposal
- Commentary on the statutory setting
- Commentary on the locational setting
- An outline of the expected environmental issues and the proposed approach to attending to them in the forthcoming environmental assessment.

It is anticipated that this material will assist the Director General of Planning in the issuing of requirements for the environmental assessment of this major project.

1.2 Project Outline

This project is concerned with large scale enhancement to local bread production capacities and improving distribution arrangements for this important food product in New South Wales. Our application seeks approval for the construction of a large, state-of-the-art bread manufacturing facility and associated refrigeration/storage and distribution arrangements.

The proposal would be located within zoned industrial land in Moorebank NSW. The Project's capital investment value is expected to be approximately $144m and deliver in the vicinity of 150 additional direct Full Time Equivalent (FTE) employment positions.

The project would incorporate advanced technology production and logistics management arrangements. Subject to regulatory approval, the project is also investigating the possibility of a clean energy program based on cogeneration technology which can align to State and Federal government renewal energy targets (RETs).

1.3 Proponent Details

Goodman Fielder is Australasia's leading and largest publicly listed food company. The company owns many major food brands familiar to Australians. Goodman Fielder holds No.1 or No.2 positions in respect of trade volumes in most of the larger product categories in which it competes, which include breads, baking ingredients, biscuits, dairy, dips, dressings/sauces, pastry/deserts, smallgoods, spreads.

Goodman Fielder's food product offering is supported by a large scale distribution network that enables delivery of the company's products to over 30,000 outlets every day, including supermarkets, route outlets and food service customers.

The company is headquartered in Melbourne and Sydney and employs over 7000 people in Australasia and the Pacific Islands. Goodman Fielder manufactures its products in almost 60 plants in Australia, New Zealand, Papua New Guinea, Fiji and New Caledonia.

Bread production and distribution is a major component of the business. The company's bread brands includes: Mighty Soft, Wonder White, Vogels, Helgas, Country Life Bakery, La Famiglia, Quality Bakers, Mollenberg and many others.

Goodman Fielder sells its bread products into the retail grocery market via branded and private label to supermarkets and convenience stores (including service stations).

1.4 Site Introduction

The Proposal is to be sited on existing Goodman Fielder Group land within the Moorebank industrial precinct some 1.5km south of the town centre of Liverpool in south-western Sydney . The Site is less than 500m north of a major interchange of the M5 Motorway.

The site is described as 14 Church Road (Lot 1 DP847587) and 90 Moorebank Avenue (Lot 1 DP 703130), Moorebank.

The site lies within the Moorebank industrial precinct and is surrounded by large industrial uses on three sides.

Church Road forms the sites northern boundary and provides access to a number of industrial premises and a key link east to Greenhills Avenue and the associated Greenhills Industrial Estate, east of the subject site.

Church Road also provides the southern boundary to the Moorebank residential area. This generally low density and low rise precinct extends to the north from Church Road to Heathcote Road.

See **Figure 1**.

Figure 1 – Site and Locality
(Source Google Earth)

The site in its entirety is owned by the Goodman Fielder group. The company currently operates a bread production operation at the western half of the site. A separate business, Display and Storage Group, operates from the eastern half of the site. The major site development would occur on this eastern portion of the site.

Figure 2 indicates the site in detail with the approximate bounds of the two existing uses. .

Figure 2 – Site Detail
(Source Nearmap)

Adjoining and nearby industrial uses are all large land-take manufacturing and service businesses and include:

- Mannheim (automotive remarketing) immediately to the south of the site fronting Moorebank Avenue.
- Sphere Healthcare (pharmaceuticals manufacture south of the site and accessing via Church Road.
- Flat Glass Industries (glass products manufacture) west of Moorebank Avenue.

As indicated above, low density residential development is located north of Church Road for the extent of the site.

1.5 Statutory Overview and Council Contact

The NSW legislative website provides that:

- The site is zoned IN1 General Industrial under Liverpool LEP 2008.
- The Height Control map indicates a maximum building height of 15m for the site.
- There is no FSR control applying to the site under LLEP 2008
- Along with much of the Moorebank industrial precinct, the LLEP 2008 flood mapping shows the site as "flood prone land" but not within the "flood planning area".
- A very small portion of the 14 Church Road site and a major portion of the 90 Moorebank Avenue site are indicated as Class 5 land in the LLEP 2008 Acid Sulfate Soils map.

On 17 February 2011, the Proponents met with senior staff at Liverpool Council[1]. Council's officers indicated that there were no obvious statutory concerns with the project in this industrial zone, and saw the proposal as generally in accord with their employment land strategy.

Compliance with the numerical standards in the local planning controls was discussed, and in particular the questions around potential non-compliances with numerical height and parking standards were considered. These and other issues requiring consideration in the formal environmental assessment of the project are addressed further at **Section 4** of this report.

The preliminary nature of this inquiry with Council is acknowledged and Council would reserve the right for full review of the project at the appropriate stage.

2. Project Description

2.1 General

The essence of the proposal is to bring expanded production capacities and associated storage and distribution improvements to the existing Goodman Fielder operation at Moorebank.

The key project element is the replacement of the existing industrial operation at 14 Church Road with a modern Goodman Fielder bread production, freezer storage, and distribution facility.

The proposed work would result in the consolidation of the existing operation with the proposed new development and brings opportunities for sharing and re-arranged administration, parking and access.

The particulars of these are discussed below.

[1] Council representatives attending the meeting were Milan Marecic - Director City Strategy, Tanya O'Brien - Manager Strategic Planning and Janine McCarthy - Manager Statutory Planning.

2.2 Building Works

Proposed building works are summarised as follows:

- Demolition of existing storage building at 14 Church Road. This allotment is some 2.27ha in area and the current GFA is estimated at 4400m2.
- Construction of new industrial facility totalling some 17,000m2 GFA on 14 Church Rd (Lot 1 DP847587), comprising, principally a state of the art manufacturing unit of some 10m height, and industrial scale product freezer of up to 35m height, with a footprint area of 1800m2 (approx).
- Construction of a carparking structure at 90 Moorebank Ave (Lot 1 DP703130), as a single parking centre for the consolidated Goodman Fielder operation (possible two level).
- Make good in terms of existing services easements such as electricity, gas and water to the satisfaction of affected stakeholders.
- Appropriate landscape and screen planting in accordance with requirements from specialist visual/landscape analysis.
- The facility will be powered with electricity from the grid, with back-up power generation via diesel generator.
- Natural gas is combusted in ovens to provide heat for the process, oven flues discharge flue gases into the atmosphere.
- Water will be supplied via Sydney Water. Waste water will be collected and primary treatment will occur on site. Solids and oils will be removed and BOD lowered via a dissolved air flotation treatment process prior to discharge to sewer.
- Small quantities of cleaning chemicals including acids and alkalis will be stored onsite for use in the operations.
- Solid waste will be collected and disposed offsite.
- Truck access to the site will be via Moorebank Avenue with some internal circulation to receivals and despatch docks.
- All staff car traffic will be via Church Road access but it is notable that there will be reduced heavy traffic on this road.

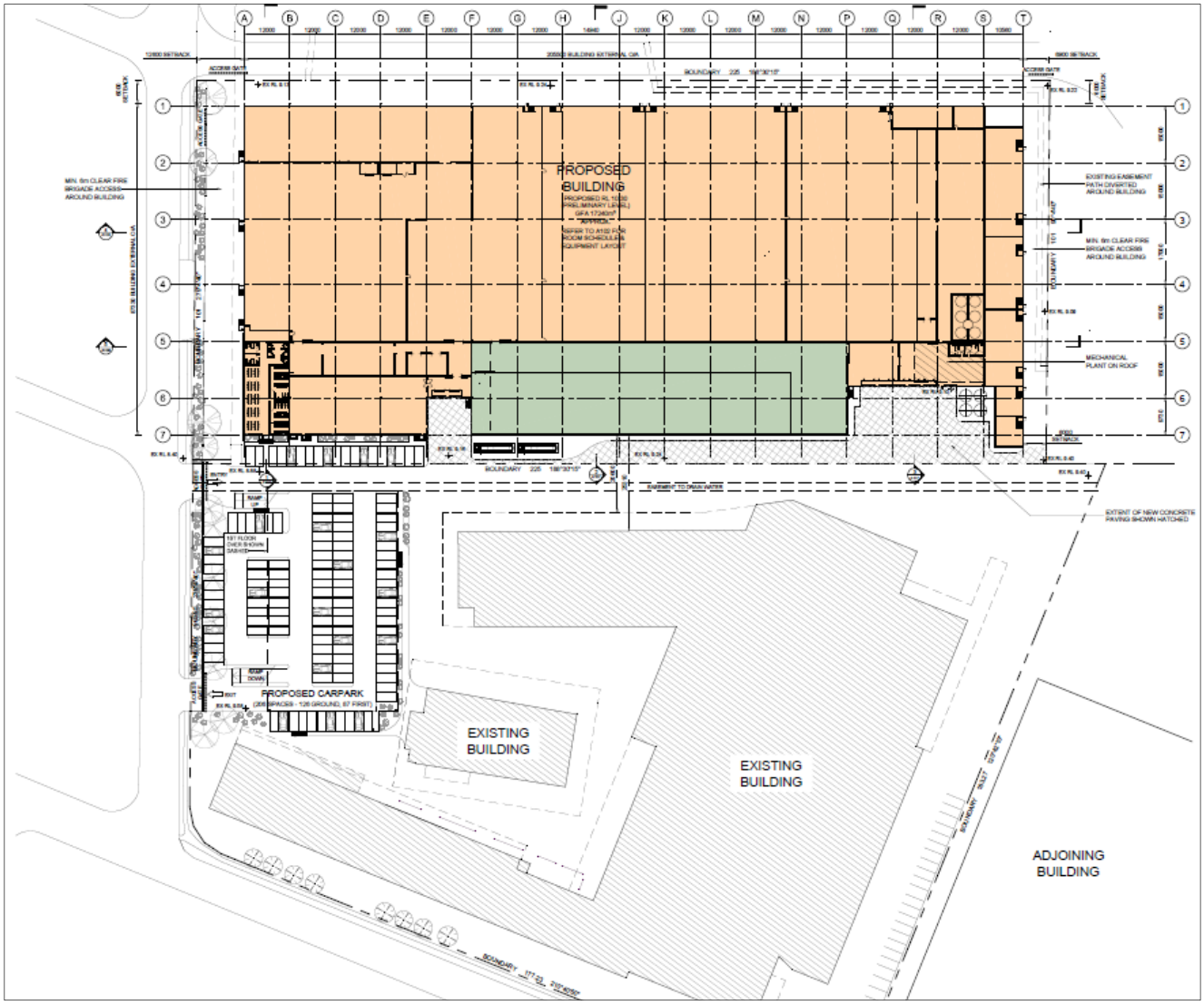

Figure 3 – Outline of proposed development
(See full submission material for larger scale plans).

It is expected that the demolition and construction process for the Project would take a period of 18months.

2.3 Production, Operations and Transport

Existing Operation

The existing manufacturing operation at 90 Moorebank Avenue produces fresh bread that is distributed from the site on a daily basis. A combination of heavy trucks and light trucks take product to their destination. Heavy trucks take large quantities of product to distribution centres, whilst smaller light trucks take product to small retailers such as the local corner store.

Ingredients or raw materials for the production process (primarily flour), are transported to site via road transport. Trucks are unloaded on-site into silos for storage and then use in the process.

Proposal
The production process involves the combination of flour, water, oils, salts and other minor ingredient to produce bread dough. The dough is cut, shaped and placed into a storage system prior to being baked in an oven. Following baking, the bread products are cooled, and some products are frozen.

Products are wrapped, packaged and palletised ready for shipping to the supermarket distribution centres. See indicative process flow diagram at Annexures (DV-P108).

Frozen product would be stored on-site in a substantial automated warehouse, awaiting specialised distribution arrangements. The product would be delivered in large quantities at scheduled times to other distribution centres. The hours for delivery are largely controlled and during non-peak periods.

Products to be Manufactured at the Plant
Products to be made at the plant include; bread sticks, rolls, sliced bread, artisan bread products, and value added bread products.

Operational Aspects and Parking
As occurs with the present operation, the facility would operate on 24 hours 7 days per week basis, with three shifts per day. Staff change-overs would be staggered and do not occur at the same time for all staff. A combination of production staff and office staff will be based at the facility. Staff for the proposed facility will park in a proposed partially two level carpark structure. The car park entry and exit will be via Church Rd. The car park will service the needs of both 90 Moorebank Ave and 14 Church Road.

Traffic Movement
Current traffic arrangements are summarised as follows:

- Moorebank Avenue used principally for heavy vehicle access to the Goodman Fielder Operation.
- Church Road used for heavy and light vehicle access to the *Display and Storage Group* site (14 Church Road), and for the majority of light vehicle access to the Goodman Fielder operation (90 Moorebank Avenue).

It is intended that the new operation would result in a reduction in the numbers of heavy vehicles accessing along Church Road.

A new single consolidated accessway for light vehicle (employee) traffic would be constructed off Church Road for the proposed new consolidated carparking facility.

Product deliveries from the site will occur between 6am – 4pm in a scheduled manner. Smaller deliveries from the existing 90 Moorebank Avenue operation are despatched between 12am – 4am.

The new facility will operated with approximately 44 persons per shift.

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2.4 Economic and Employment Considerations

While new jobs in greenfields industrial sites is important, stimulation of investment in established employment areas (brownfield sites) is a keen interest of government as a means of optimising existing infrastructure investment and providing jobs close to home[2]. This proposal is supportive of that principle in proposing capital investment in the order of $100m and in the vicinity of 150 FTE jobs (over 3 shifts) in an established industrial precinct close to residential development .

[2] See for example: NSW Government, *Metropolitan Plan for Sydney 2036*, 2010 and Liverpool City Council, *Industrial Lands Strategy*, undated.

2.5 Consideration of Alternatives

Both strategic business alternatives and site selection alternatives have been considered by Goodman Fielder in the selection process leading to the choice of the Moorebank site as the preferred option for this Project.

3. Environmental Setting

3.1 Overview

The Moorebank industrial precinct is a long established employment area located south-east of Liverpool City Centre generally between Newbridge Road and the M5 motorway. Georges River provides the western boundary and a riparian/open space corridor separates the area from the residential lands to the east.

In 2001 employment numbers in the area south of Newbridge Road was around 10,400. Since then development of the land along the M5 Corridor has occurred. The precinct contains a full range of industrial activities.

There are plans underway for a major transport terminal in the Moorebank area which has potential to meet some Sydney's intermodal capacity needs.[3]

It is noteworthy, for this Project in particular, that there is a well defined residential precinct within the general bounds of the industrial area. This residential area is defined by Heathcote Road, Moorebank Avenue and Church Road. The southern boundary of the residential area is Church Road which also forms the northern boundary of the subject site.

Church Road is already in significant use for industry-oriented purposes. However, reasonable management of issues associated with residential amenity will be an important feature of the subject Project.

[3] Discussions with Council February 2010 and see NSW Government, *Economic and Employment Directions South West*, p30 http://www.metroplansydney.nsw.gov.au

Photo – View along Church Road. Subject site is on the right hand site and residential land is on the left hand side.

4. Environmental Issues/Mitigation

4.1 Overview – Improved Production and Market Accessiblity

There are a number of positive aspects of the proposed development which will be addressed in the Environmental Assessment Report. These are associated with improved production efficiency, and improved accessibility to markets for the food products produced at the facility. The associated public benefits include economic and employment benefits associated with the initial capital investment and the long term significant employment increases in the local area provided directly and indirectly as a consequence of the Project.

4.2 Potential Environmental Impacts

The table below lists the issues which are currently considered as warranting further investigation in a full Environmental Assessment (EA) report for the Project. Each nominated issue is accompanied by a brief commentary, and the proposed EA response.

Issue	Commentary	Proposed Response
Visual impact	– The refrigeration unit which is central to the project purpose is some 35m in height and would exceed the numerical standards in LLEP 2008. – More generally the site landscaping and	Undertake specialist visual impact assessment, and propose mitigation strategies/measures, that would be

Issue	Commentary	Proposed Response
	building setback provisions will require specialist landscape architectural input. – There is a need to ensure that there is reasoned consideration of the potential visual impact in the project assessment.	applied to the project.
Noise impact	– The proposal includes 24/7 operation. – Details on plant/ equipment and traffic noise will need to be evaluated, especially in regard to the residential properties fronting Church Road.	Provide details on activities/equipment with potential noise effects. Undertake specialist acoustic impact assessment, including any mitigative treatments necessary.
Lightspill	– Site night lighting is not yet detailed. It will be necessary to ensure that the project does not bring unreasonable light spill impacts especially in regard to the adjoining residential lands to the north.	Lightspill investigation in EA to include any required mitigation arrangements.
Traffic and parking management	– Industrial (heavy vehicle) traffic from the operation is to be directed to Moorebank Avenue and thus reduce large truck traffic on Church Road. – It will be necessary to investigate traffic safety/efficiency for the subject proposal, including any access improvements. – Employee parking would be accessed from Church Road in a new carparking area, partially two level construction. – The quantum of parking proposed would meet employee demands but may not meet numerical standards in the current code and will warrant detailed analysis.	Details of anticipated daily and peak traffic movements to be provided. EA to include specialist traffic and parking input, including intersection analysis, and recommendations on any required improvements.
Emissions to atmosphere and odours	– The production process will release emissions to the atmosphere. It is intended to ensure that all emissions meet regulatory requirements including Clean Air Regulation limits. However empirical detail will be required.	Emissions and odours specialist input.
Energy	– As a major corporation, Goodman Fielder is committed to the Australian Government's Energy Efficiency Opportunities program Goodman Fielder is already committed to identification, evaluation and public reporting on its energy savings opportunities	Goodman Fielder has established performance metrics for its impact on the environment and relevant data will be provided in regard to the proposal at EA stage.

Issue	Commentary	Proposed Response
Acid Sulfate Soils	– A portion of the site is shown as Class 5 land in LLEP 2008 Acid Sulfate Soils mapping. Under clause 7.7 of LLEP 2008: " works within 500m of adjacent Class 1, 2, 3 or 4 land that is below 5 metres AHD by which the watertable is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land" requires certain further investigations to be made. – As it is currently understood, the only significant work proposed with this application on mapped Class 5 land is the proposed carpark. It is unlikely that these works would require significant excavation works.	Further investigated in the final EA including analysis of proposed excavation with carpark.
Floodplain implications	– The site is shown as flood prone land in LLEP 2008. Under clause 7.8 of LLEP 2008, it is a requirement to ensure that any development in such land will, among other things, not adversely affect flood behaviour and increase the potential for flooding to detrimentally affect other development or properties.	Specialist review of floodplain issues.
General site services	– Existing easements will need to be reviewed and made good with the proposed development. – It is intended to introduce an electricity cogeneration scheme with the Project.	Services plan will be required with EA.
Waste management and recycling	– Product waste streams will be identified and a Waste Management Plan agreed.	Waste management plan to be provided with EA.

5. Concluding Remarks

5.1 Conclusion

This preliminary environmental assessment has been provided to assist in the assessment of a major project under Part 3A of the EPA Act.

The attached plans, and information contained in this report is submitted to assist the Director General in setting down requirements for the environmental assessment of this Project.