Statement of Environmental Effects

Proposed Installation of Aluminium Casting Line

Lot 1 DP 812244
2 Hallstrom Avenue, Taree

March 2025
Final

Prepared for
Jamestrong Packaging Pty Ltd

Project: 22265

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List of Abbreviations

Acronym	Definition
dBA	Decibel (A-weighted)
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
ASS	Acid Sulfate Soils
BoM	Bureau of Meteorology
DCP	Development Control Plan
DPE	Department of Planning and Environment
DSEWPC	Department of Sustainability, Environment, Water, Population and Communities
EPA	Environmental Protection Authority
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
LEP	Greater Taree Local Environmental Plan 2010
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NEPM	National Environment Protection Measure
NIA	Noise Impact Assessment
NPfI	NSW Noise Policy for Industry (2017)
NML	Noise Management Level
PBP	Planning for Bush Fire Protection 2019
PMF	Probable Maximum Flood
PNTL	Project Noise Trigger Levels
RFS	Rural Fire Service
RTO	Regenerative Thermal Oxidiser
SEPP	State Environment Planning Policy
TEC	Threatened Ecological Communities
VENM	Virgin Excavated Natural Material

1. INTRODUCTION

This Statement of Environmental Effects (SoEE) has been prepared in relation to a Development Application (DA) for proposed installation of a manufacturing process line (aluminium casting) within an existing industrial premises at 2 Hallstrom Avenue, Taree.

Jamestrong Precision Packaging Taree specialises in the manufacture of aluminium aerosol and beverage cans, producing approximately 120 million cans per annum. The facility has recently received a $240,000 grant from the NSW Government's Regional Job Creation Fund to install a new manufacturing process line that will increase the employment capacity of the facility by around 10%.

The proposal is local development and subject to assessment under Part 4 of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

The premises is subject to an Environmental Protection Licence (EPL) under the *Protection of the Environment Operations Act 1997* (POEO Act) for Scheduled Activities of "printing, packaging, visual communications and waste generation (resulting in >100T of waste generated per annum)". As the proposed development relates to a scheduled premise, the proposal would be subject to the conditions of the current EPL regulated by the NSW Environment Protection Authority (EPA).

The purpose of this SoEE is to describe the proposal and consider the potential environmental impacts of that development having regard to the matters for consideration under Section 4.15 of the EP&A Act.

2. THE SITE

2.1.1 Site Details

The site is an established industrial premise located at the corner of Hargreaves Drive and Hallstrom Avenue, Taree.

Address	2 Hallstrom Avenue, Taree
Lot / DP	Lot 1 DP 812244
Area	3 hectares
Local EPI	Greater Taree Local Environmental Plan 2010
Zoning (Current)	E5 – Heavy Industrial

2.1.2 Existing Buildings

The site is presently occupied by a large industrial complex used for the manufacture of aluminium aerosol and beverage containers. The main manufacturing facility has an area of approximately 7,800m^2 (inclusive of offices storage and workshops) and is located centrally within the site.

Detached storage sheds are located in the south-western corner of the site, adjacent to the existing loading bays located at the southern end of the manufacturing building. Existing LPG stores, argon gas supplies and other ancillary infrastructure are located in the southern part of the site.

The existing industrial building is equipped with a number of spaces used as offices, reception areas, storage areas and fabrication shops. The central portion of the building is an open plan space with the western part of the building containing three existing manufacturing process lines for container production.

The eastern part of the building (the subject of this DA) formerly contained an aluminium casting line and was used for the manufacturing of aluminium slugs. That process line was decommissioned in 2014 and, since that time, the eastern part of the building has been used for general packaging and material storage in association with the aluminium can manufacturing processes.

Visitor and employee car parking areas are provided at the northern end of the site and accessed via Hallstrom Avenue. Heavy vehicle access is available to the loading bays via Hargreaves Drive.

Photo 2.1: Existing loading bay at the southern end of the manufacturing building

Photo 2.2: Loading bay entry at the southern end of the manufacturing building and providing access to the proposed casting line

2.1.3 Surrounding Land Uses

The subject site is located at the western edge of an established industrial estate which generally occupies land between the site and Wingham Road. Land immediately to the south of the site (between Hargreaves Drive and Kolodong Road) also contains a large industrial facility.

Land to the north, south-west and west of the site is vacant land that contains native vegetation separating the site from dwellings to the north and south of the site on Kolodong Road. The nearest dwellings to the site exist (approximately):

- 190 metres north of the site at 410 Kolodong Road
- 540 metres south/south-west of the site at 286-350 Kolodong Road;
- 380 metres north of the site on Wingham Road; and
- 550 metres east of the site at Potoroo Drive.

The Taree Christian College is located approximately 250 metres north-west of the site on the western side of Kolodong Road.

Land on the western side of Kolodong Road is vacant land that is zoned *R1 General Residential*.

A site locality map is provided at Figure 2.1.

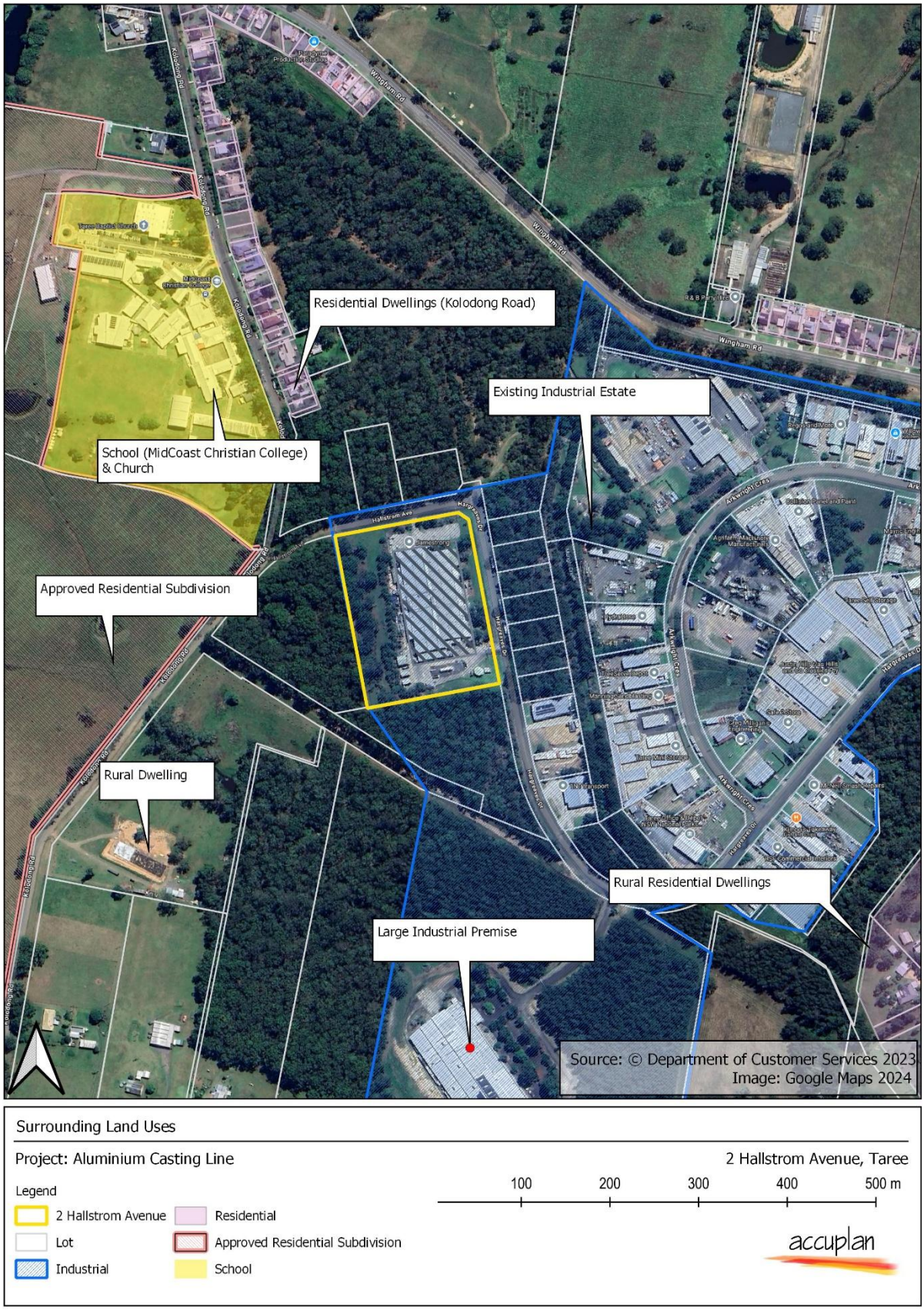


Figure 2.1: Site locality and surrounding land uses

2.2 Background and Approvals Context

Two recent Development Applications have been approved by MidCoast Council:

- DA2021/1606: Proposed installation and use of MEGTEC Millennium Regenerative Thermal Oxidiser for the purposes of reducing air emissions; and
- DA2022/1231: Installation of foundations for the future (now proposed) casting line.

DA2022/1231 granted consent for the internal alterations and structural foundations to support the future installation of the manufacturing process line (the subject of this development application).

Consent for the alterations was sought to allow the structural phases of the project to progress while a separate DA was prepared to seeking consent for the operation of the process line and associated amendments to the EPL.

The foundation works involved alterations to the existing floor slab within the eastern part of the building. No changes were made to the internal configuration or uses of the building or floor area. Foundation construction works have been completed.

3. THE PROPOSED DEVELOPMENT

The proposed development is for installation and use of manufacturing plant and equipment described as an "aluminium casting line". The casting line produces aluminium 'slugs' (see Photo 3.1) that are the raw material used in the manufacturing of aluminium aerosol and beverage containers at the facility (aluminium container production).

Installation of the casting line involves a range of work, including:

- Commissioning manufacturing equipment installed on foundations that have been constructed under a previous DA;
- Installation of pollution control equipment (exhaust stacks, and installation of new pollution control systems as needed);
- Commission two existing cooling towers; and
- Installation of acoustic enclosures around the slug presses.

Since the decommissioning of the original casting line in 2014, Jamestrong Packaging have been reliant on the importation of aluminium slugs from international suppliers. An opportunity has therefore been identified to recommence production of the slugs locally, using high quality aluminium ingot produced at Tomago Aluminium.

At present production rates, it is estimated that over 4,000 tonnes of aluminium slugs may be produced at the facility resulting in the direct employment of at least 12 full time staff and providing long term supply chain security for the facility.

There are currently no manufacturers of aluminium slugs or aluminium coil within Australia. As such, the facility would have capacity to produce surplus products for distribution to other Australian manufacturers, further reducing the reliance of Australian manufacturing facilities on international supply chains.

3.1.1 Proposed Plans and Supporting Information

The proposed development is for use of the existing building and installation of equipment for aluminium processing (casting). The proposal does not involve any building works that would require preparation of architectural plans.

The location of the process line in relation to existing floor areas is depicted on the plans listed in Table 3.1.

Table 3.1: Plan Summary

Dwg No.	Prepared by	Title	Revision	Date
BTE-2022-056-6039-S01	By-Tech Engineering	Jamestrong – Taree Hazelett Aluminium Casting Line Plant Equipment	01	29.01.2025
BTE-2022-056-0000-S02	By-Tech Engineering	Jamestrong, 2 Hallstrom Avenue – Taree, Aluminium Casting Line Project, Site Layout Plan - Foundations	P3	14.09.2022

The following supporting information accompanies the Development Application:

- Letter from MJM Environmental to EPA dated 14 January 2025.
- Noise Impact Assessment, Jamestrong Packaging Facility, prepared by EMM Consulting Pty Ltd, dated 8 January 2025 (Ref: E240850).
- Aluminium Casting Line - Air Quality Impact Assessment 2024, prepared by MJM Environmental Pty Ltd, dated 3 April 2025.

Photo 3.1: Aluminium slugs (currently imported) to be produced in the casting line

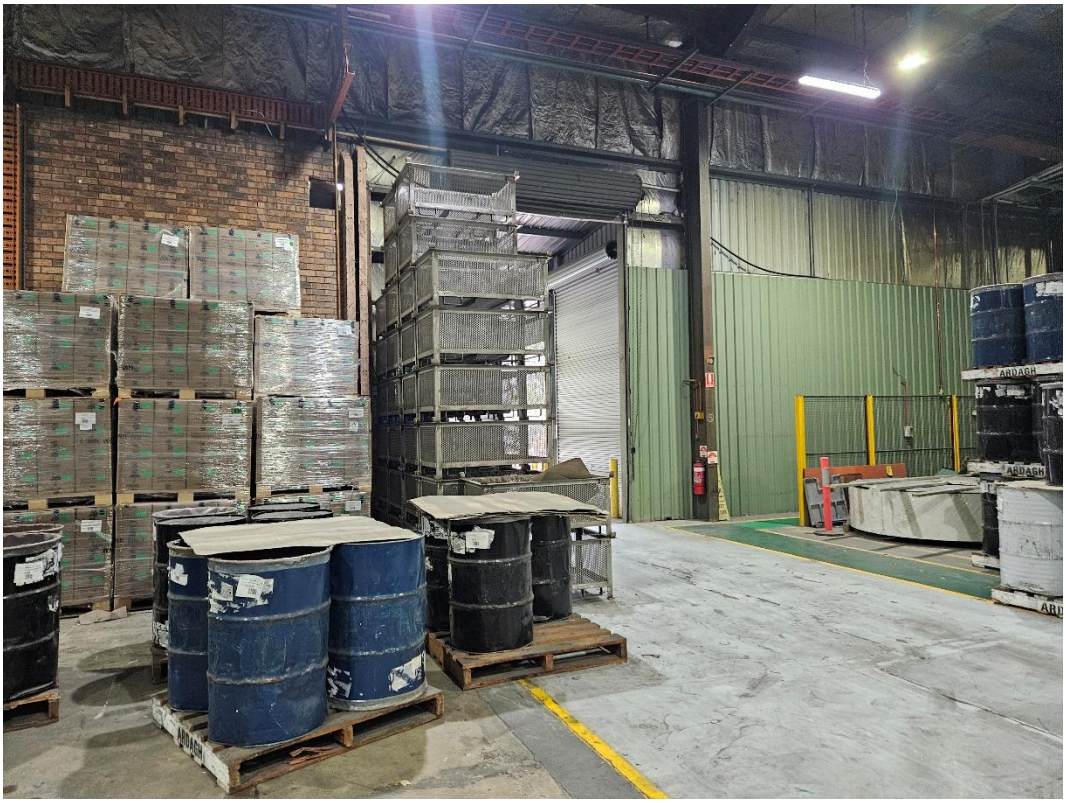


Photo 3.2: Existing storage and loading area for of imported aluminium slugs

3.1.2 The Casting Line

The proposed aluminium casting line will be installed within the eastern part of the facility and will generally occupy the same area of the site that was formerly used as an aluminium casting line prior to decommissioning of that line in 2014.

The process generally involves the melting of aluminium ingot and suitable scrap aluminium (skeleton) within a furnace, followed by casting the molten aluminium, milling, pressing and annealing to produce an aluminium slug.

The individual components of the casting line as described in Figure 3.1 and comprise:

1. **Molten Aluminium Furnace:** The furnace is the first part of the manufacturing process and involves the melting of aluminium ingots into liquid aluminium. The furnace is fuelled by the existing LPG gas stores.
2. **Casting Strip:** The casting strip involves the moulding of molten aluminium into continuous lengths of hot aluminium ready for sizing.
3. **Hot sizing Mill:** The first process of extruding the hot malleable aluminium to the appropriate diameter.
4. **Cold Sizing Mill:** Further refinement of aluminium sizing following cooling.
5. **Flying Shears:** Involves cutting of the continuous length of aluminium into individual lengths that are suitable for later coiling.
6. **Coilers 1 & 2:** Aluminium is coiled onto rolls and lifted out of the process line by gantry.
7. **Un-Coiler:** The coils are straightened.
8. **Slug Press 1 and 2:** The slug press stamps individual slugs into the final size and shape.
9. **Annealer:** The annealer is a gas fired oven that heats slugs to a high temperature to 'reset' the previously work hardened aluminium slugs to allow later extrusion.
10. **Rumbler:** The rumbler tumbles the finished/annealed slugs together in batches to remove burs and smooth the surface of the product.

The process line equipment (non-operational) is depicted in Photo 3.3 to Photo 3.6 below.

Photo 3.3: Aluminium furnace

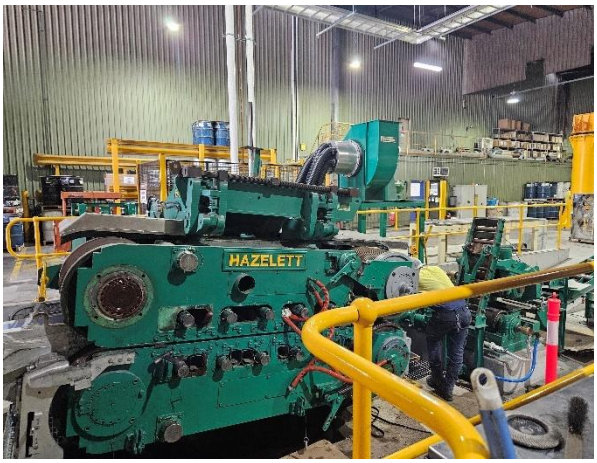


Photo 3.4: Hot sizing mill

Photo 3.5: Slug press (to be surrounded with acoustic panelling)

Photo 3.6: Annealing oven

Figure 3.1 provides a process flow chart. The location and installation sequence of the proposed casting line is shown in Figure 3.2 below.

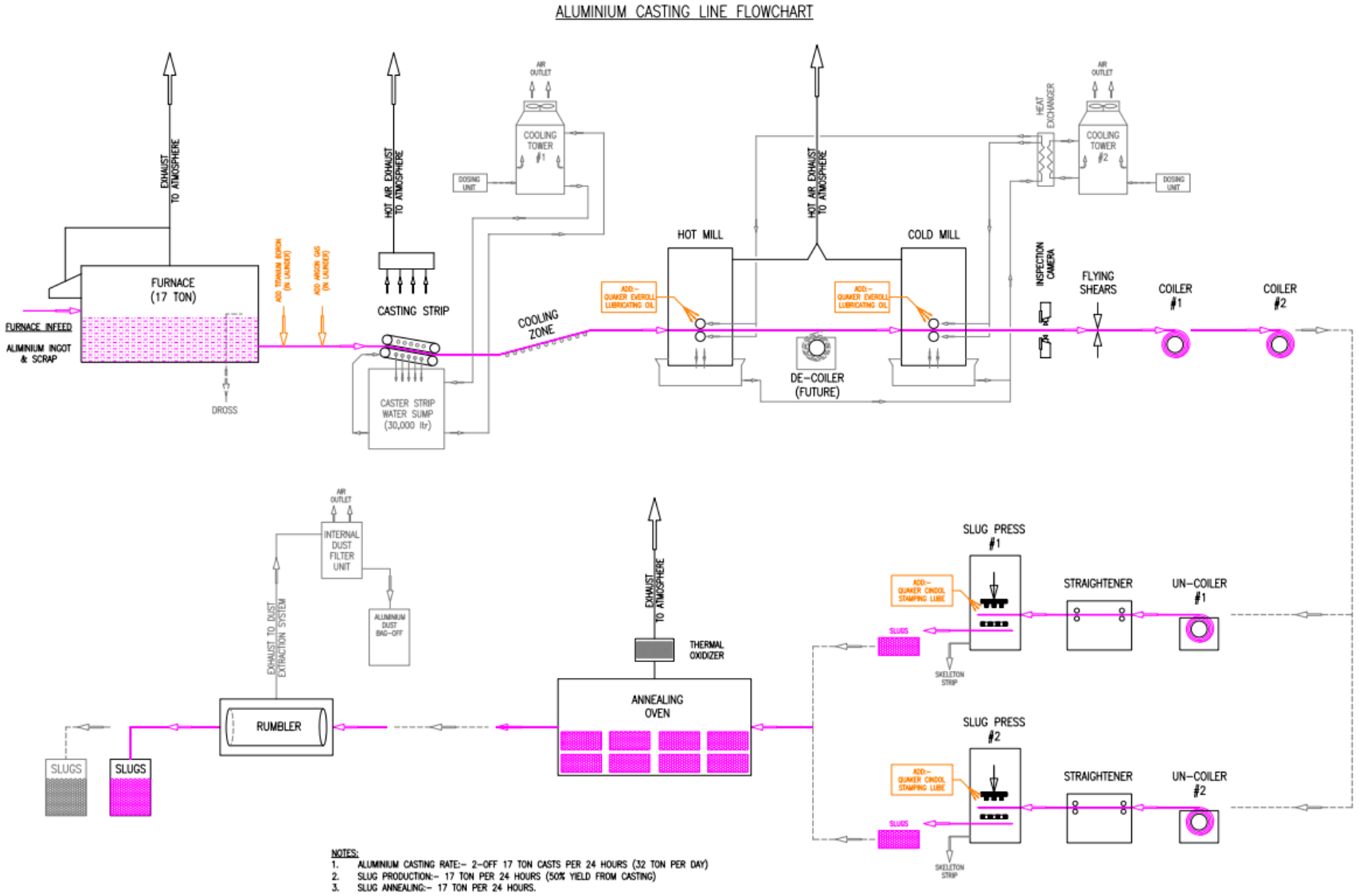


Figure 3.1: Process Line Flow Chart

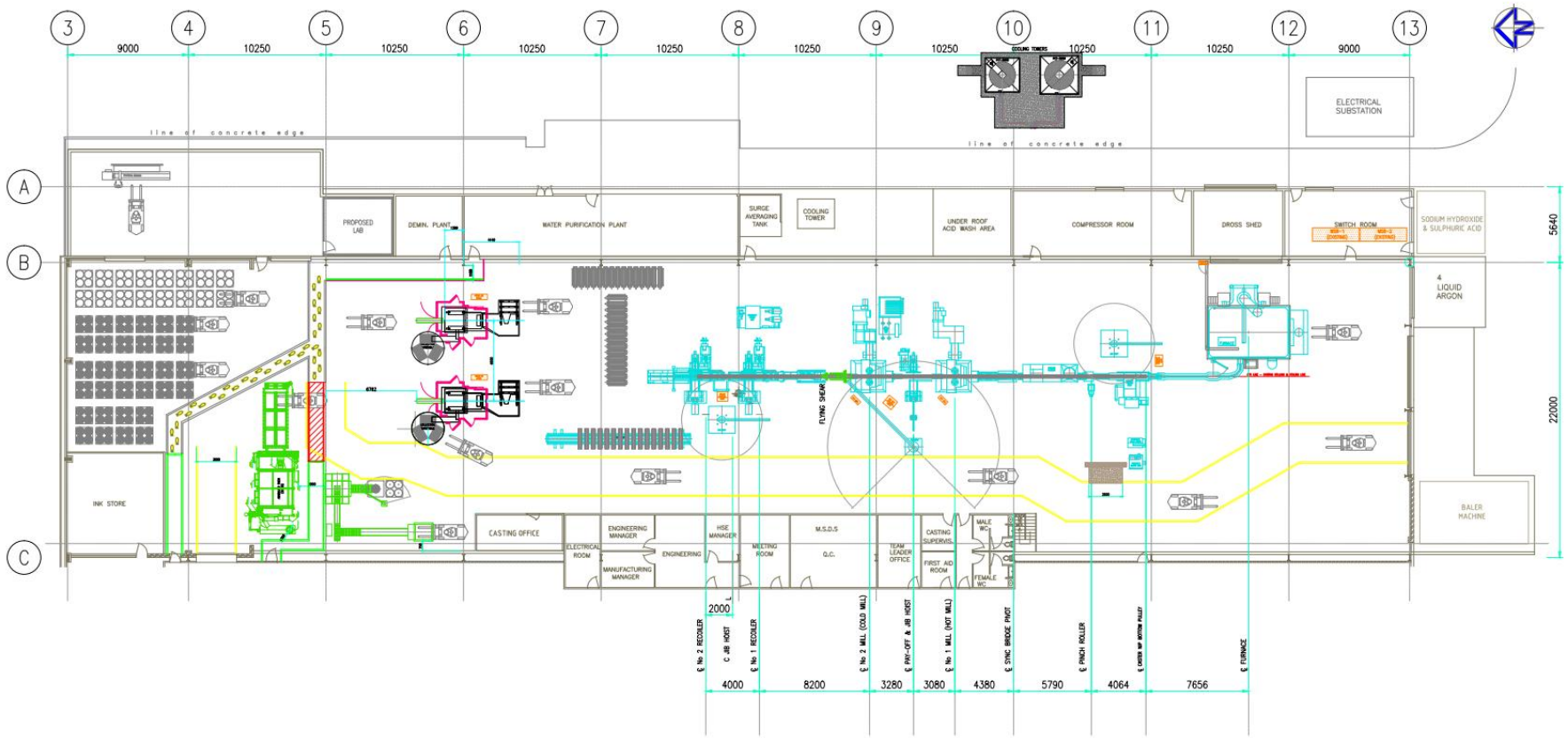


Figure 3.2: Part floor plan (eastern part of the building) detailing layout of the casting line equipment (By-Tech Engineering)

3.1.3 Operating Hours and Capacity

The casting line will operate 24 hours per day and 4 days a week which is within the existing operating hours of the facility which operates 24 hours a day 7 days per week.

The processing capacity of the casting line is expected to be:

- Two (2) individual casts would be processed each day.
- Each cast processes 17 tonnes of aluminium at a rate of 1.4 tonnes/hr.
- The total daily processing capacity would be approximately 34 tonnes of aluminium (including reprocessed skeleton).
- The annual processing capacity is approximately 4,000 tonnes of aluminium ingot.

3.1.4 Material Inputs

Raw material inputs are limited to high-grade aluminium ingot that is presently available from Tomago Aluminium. While the only inputs are aluminium ingot, the production process has a yield of approximately 65% of input material. The remaining 35% of scrap (skeleton) is reprocessed in subsequent casts, where suitable.

Aluminium ingot is delivered via truck and stored adjacent to existing materials storage areas at the southern part of the site (Photo 3.7).

The main fuel source for both the furnace and the annealing oven is LPG, while all other equipment is electricity driven. Existing LPG stores have capacity for the casting line and do not need to be supplemented for the proposed development. Other process inputs are limited to small quantities of lubricants, biocides (cooling towers) and gases, similar to materials used in existing manufacturing lines.

Table 3.2 below summarises the main material inputs and chemicals used in the operation of the process line.

Table 3.2: Chemicals and Materials

Material	Use	Quantity	Storage
LPG	Furnace, Annealing Oven		Bulk Stores (existing)
Biocides	Cooling Towers	Variable	Cooling Towers
Inhibitor (Class 8)	Cooling towers	Various	Cooling Towers
Graphite in Water	Dagging Casting Wheel	16kg	Casting Area
Coatings and miscellaneous materials	Casting	50-100kg	Casting Area
Pyro Flux (Class 6.1)	Casting	50kg	Casting Area
Aluminium Titanium Boron	Tibor Rod	540kg	Casting Area
Acetylene & Oxygen (Class 2.1 & 2.2)	Casting	3 bottles each	Casting Area
Argon Liquid	Casting		Bulk Storage (existing)

An inventory of dangerous goods and relevant screening thresholds in provided in Section 4.5.2.1 for the purposes of considering the application of *State Environmental Planning Policy (Resilience and Hazards) 2021* to potential hazardous industry.

Photo 3.7: Aluminium ingot sourced from Tomago aluminium

Photo 3.8: Existing LPG stores

3.1.5 Waste

Table 3.3 below summarises the expected waste generation as a result of the casting line.

Table 3.3: Waste Products

Waste Material	Source	Quantity	Destination and Storage
Aluminium Dross (Class 4.3)	Aluminium Furnace	Up to 1 tonne of dross may be stored on site at any time	Dross is stored in a dedicated dross shed located adjacent to the furnace. The dross shed is existing and was formerly used as a dross store for the previous casting line. As a Class 4.3 dangerous good, the dross would be stored in accordance with relevant standards for the storage of dangerous goods. Waste dross would be transported off site to aluminium recycling facilities via licenced waste transport contractors and in accordance with the Protection of the Environment Operations (Waste) Regulation 2014. Recycling facilities are available at Yatala Aluminium Recycling facility and transport of waste is available via High Quality Waste Treatment Services, which is expected to be the preferred transport option for removal of waste dross.
Waste Slugs	Slug Press and Rumbler	Variable (< 1 tonne)	Waste aluminium slugs are likely to be produced as a result of imperfections that make the product unsuitable for production of cans. Waste slugs are unsuitable for reprocessing and would be commercially recycled with other waste aluminium products produced in the can manufacturing process.
Water	Cold Sizing Mill	1,000 litres	The cold sizing mill utilises water to cool hot aluminium. The water is contained within a tank below the mill and recirculates in a closed circuit that does not leave the process line and does not interact with materials that could cause high levels of chemical or metal contamination. Waste cooling water requires replacement every 3 months. Cooling water is pumped from the reservoir by a waste removal contractor for disposal at licenced waste processing facilities. Cooling water is not stored on site or discharged to sewer or stormwater.

4. ENVIRONMENTAL AND PLANNING LEGISLATION

4.1 Environmental Planning and Assessment Act 1979 and Regulation 2021

The provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) relate to the assessment of development and activities in NSW.

The development is subject to assessment under Part 4 of the Act.

The objects of the EP&A Act are:

a) *to encourage:*

   i. *the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
   ii. *the promotion and co-ordination of the orderly and economic use and development of land,*
   iii. *the protection, provision and co-ordination of communication and utility services,*
   iv. *the provision of land for public purposes,*
   v. *the provision and co-ordination of community services and facilities, and*
   vi. *the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
   vii. *ecologically sustainable development, and*
   viii. *the provision and maintenance of affordable housing, and*

b) *to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*

c) *to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

This SoEE considers the proposed development on economic, social and environmental grounds and takes into consideration the objects of the EP&A Act. In this respect, the proposal represents an orderly and economic use of available industrial zoned land.

4.1.1 Designated Development

Schedule 3 of the EP&A Regulation defines particular categories of development as 'designated development' for the purposes of Section 4.10 of the EP&A Act. Categories of designated development include "mineral processing or metallurgical works", which is defined in Schedule 3 of the EP&A Regulation as follows:

> ***mineral processing or metallurgical works*** *means works at which any of the following is carried out—*
>
> *(a) the commercial production or extraction of ores using methods including chemical, electrical, magnetic, gravity or physico-chemical methods,*
>
> *(b) the commercial refinement, processing or reprocessing of metals involving smelting, casting, metal coating or metal products recovery.*

Table 4.1 below considers the proposal in relation to the relevant criteria.

Table 4.1: Designated Development Criteria – Clause 33: Mineral processing or metallurgical works

Criteria	Relationship
(5) Development for the purposes of mineral processing or metallurgical works is designated development if the works are located -	
(a) within 40 metres of a natural waterbody, or	There are no natural waterbodies within 40m of the development.
(b) within 100 metres of a wetland, or	There are no wetlands within 40m of the development.
(c) in an area of high water table, or	High water table is defined as areas where the groundwater depth is less than 3 metres below the surface at its highest seasonal level. The proposal does not appear to be located in an area of high water table.
(d) within 500 metres of a residential zone and, in the consent authority's opinion, considering topography and local meteorological conditions, are likely to significantly affect the amenity of the neighbourhood because of noise, vibration, odour, fumes, smoke, soot, dust, traffic or waste, or	The nearest residential zone is on the western side of Kolodong Road and approximately 200m from the proposed development. In relation to the criteria for designated development, the proposed development is located within a Scheduled Premise and both air and noise emissions are regulated through an EPL. The predicted post-development noise and air emissions are described in the accompanying technical studies (MJM, 2024 and EMM, 2024). Those studies provide recommendations for mitigation measures to ensure that emissions do not increase

Criteria	Relationship
	compared to the existing premise, when measured at the nearest sensitive receptor, and maintain compliance with current EPL limits. EPL limits are established having regard to industry guidelines, including the *Noise Policy for Industry* and *Approved Methods*. As such, adherence to the existing EPL noise and air emission limits would ensure that the proposed development is "unlikely to significantly affect the amenity of the neighbourhood" and would not meet the criteria to be identified as designated development on the basis of impacts on neighbourhood amenity.
(e) so they are likely, in the consent authority's opinion, considering topography and local meteorological conditions, to significantly affect the environment because of the use or production of toxic substances.	The proposal does not use or produce toxic substances that have potential to significantly affect the environment. Air emissions are regulated and monitored in accordance with the EPL.

Despite the criteria under Clause 33, the casting line would also meet the "exceptions" in Part 3, Section 48 of the EP&A Regulation as "alterations and additions to existing development". In this respect, development involving alterations or additions to development, whether existing or approved, is not designated development if, in the consent authority's opinion, the alterations or additions *do not significantly increase the environmental impacts of the existing or approved development*.

Table 4.1 below considers the proposal in relation to the relevant matters for consideration.

Table 4.2: Section 48(2) Considerations for Exceptions to Designated Development

Consideration	Relationship
In forming its opinion, a consent authority must consider the following -	
(a) the impact of the existing development, including the following—	
(i) previous environmental management performance, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice	Conditions of the EPL require the implementation of a Pollution Reduction Study 4 (PRS) that aims to reduce overall emissions from the facility over time. That PRS has been implemented progressively with installation of air emission controls that reduce both point source and fugitive air emissions from existing operations. Three (3) other Pollution Reduction Programs (PRPs) have also been completed over recent years, including most recently noise investigations (PRP 2) and stack modifications (PRP 3).

Consideration	Relationship
	Overall, the facility has made significant reductions in emissions from both air and noise sources since 2020. The facility maintains compliance with air and noise limits contained in the current EPL.
(ii) rehabilitation or restoration of any disturbed land	N/A
(iii) the number and nature of all past changes and their cumulative effects	The facility previously incorporated an aluminium casting line in the same location as the proposed casting line. That casting line was decommissioned in 2014 and prior to the introduction of noise emission limits as conditions of the EPL. There have been no notable changes to the existing manufacturing operations since decommissioning of the previous casting line.
(b) the likely impact of the proposed alterations or additions, including the following—	
(i) the scale, character or nature of the proposal in relation to the development,	The proposed development is contained within the existing manufacturing building and maintains a similar industrial 'nature' of use. The overall scale of the manufacturing processes remains similar to existing, with any current importation of materials (ingot) generally replacing the existing importation of finished slugs.
(ii) the existing vegetation, air, noise and water quality, scenic character and special features of the land on which the development is, or will be, carried out and the surrounding locality,	The proposed alterations are contained entirely within the existing building. There is no potential to impact on the environmental features of the locality. The existing air and noise environment is described in the accompanying technical studies. Those studies provide recommendations to ensure that the development is capable of operating within the existing noise and air emission limits.
(iii) the degree to which the potential environmental impacts can be predicted with adequate certainty,	Environmental impacts relating to noise and air emissions are assessed quantitatively under current industry guidelines. Air emissions are capable of being predicted based on industry accepted Emission Factors for relevant equipment. Compliance with operational noise limits would be verified through attended noise monitoring prior to commencement of manufacturing. Noise mitigation measures are to be adapted at that time to provide certainty that operational noise emissions do not exceed the current noise emissions from the facility.
(iv) the capacity of the receiving environment to accommodate changes in environmental impacts,	The site is located in an established industrial precinct with adequate infrastructure to accommodate any

Consideration	Relationship
	changes in environmental impacts arising from industrial activities. The nearest sensitive receivers are separated from the site by at least 190 metres and are affected by other industrial and road noise sources in the locality. As above, the proposal would not increase noise emissions and any changes in environmental impacts are unlikely to be noticeable in the context. A residential subdivision is approved on land to the west of the site, on the western side of Kolodong Road. That development is subject to conditions of consent requiring noise attenuation barriers to mitigate noise impacts at future residences such that the facility would maintain compliance with the current EPL noise limits.
(c) proposals to mitigate the environmental impacts and manage residual risk,	The proposal continues to be regulated by the existing EPL (subject to any amendments). Environmental impacts relating to noise and air emissions are capable of being mitigated such that they adhere to current EPL limits during the day, evening and night periods. Specific recommendations are contained in the Noise Impact Assessment which provide guidance on reasonable and feasible mitigation measures to reduce the noise from new plant so that it is 10 dB quieter than all other plant operating in the facility, such that the facility can comply with the current licence limit of 40 dB.
(d) proposals to facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities.	As above, specific recommendations are made to achieve compliance with the industry guidelines related to regulation of air and noise impacts, including the NPfI and Approved Methods.

4.1.2 Integrated Development

Section 91 of the EP&A Act relates to Integrated Development. Integrated Development is development that, in order for it to be carried out, requires development consent and one or more additional approvals. Table 4.3 is a summary of relevant integrated approvals referred to in Section 4.46 of the EP&A Act.

Table 4.3: Integrated Development

Act	Relevance to the proposal	Integrated (Y/N)?
Coal Mine Subsidence Compensation Act 2017 *Section 22*	This site is not located within a mine subsidence district.	No
Fisheries Management Act 1994 *Sections 144, 201, 205, 219*	The proposal does not involve aquaculture, dredging or reclamation work, does not impact on any marine vegetation, and does not result in the obstruction of any bay, inlet, river or creek, or across, to or around a flat.	No
Heritage Act 1977 *Section 58*	The proposal does not involve any action(s) referred to in s 57(1) and does not require approval under Section 58 of the Act.	No
Mining Act 1992 *ss 63, 64*	A mining lease is not being sought for the proposal.	No
Petroleum (Onshore) Act 1991 *Section 16*	A production lease is not being sought for the proposal.	No
Protection of the Environment Operations Act 1997 *Sections 43(a), 47 and 55* *Sections 43(b), 48 and 55* *Sections 43(d), 55 and 122*	The proposed development relates to a scheduled premise and is subject to the Environment Protection Licence (EPL) for the facility. All activities carried out at that premise are regulated by the existing EPL, including the proposed casting line and any associated emissions from that process. As a scheduled premise, the conditions of the EPL would also regulate the transport of waste, including any trackable waste for the purposes of the Waste Regulation.	**Yes**
Roads Act 1993 *Section 138*	The proposal will not involve any works within the public road and will not require approval under Section 138 of the Roads Act 1993. Council is the roads authority and the consent authority for the proposal. Even if the proposal resulted in works within the public road (for example, temporary traffic management or dust mitigation during construction), the proposal is not integrated development as Council is the roads authority.	No

Act	Relevance to the proposal	Integrated (Y/N)?
Rural Fires Act 1997 *Section 100B*	While the site is mapped Bushfire Prone Land, the proposal does not involve subdivision of bushfire prone land and is not a Special Fire Protection Purpose. A Bushfire Safety Authority is not required from the Commissioner of the NSW Rural Fire Service under Section 100B(1) of the *Rural Fires Act 1997* (RF Act).	No
Water Management Act 2000 *Section 89, 90, 91*	The proposal does not require an approval under the WM Act.	No

4.2 Protection of the Environment Operations Act 1997

The *Protection of the Environment Operations Act 1997* (POEO Act) has the object of achieving the protection, restoration and enhancement of the quality of the NSW environment. The existing facility holds an EPL for Scheduled Activities and Fee Based Activities under the POEO Act (EPL No. 11714).

Clause 47 of the POEO Act requires a licence from the EPA for "Scheduled Activities". The proposed development will include the processing of aluminium, which is a "metallurgical activity" as defined in Schedule 1 of the POEO Act. In relation to the criteria for declaration of a Scheduled Activity, the proposed casting line does not have capacity to process more than 10,000 tonnes of alumina or metal per year, and does not meet the criteria to be declared a Schedule Activity.

Therefore, the proposed development is not a "Scheduled Activity" in isolation from the existing facility. In any respect, the premise at which the activity is carried out has an EPL under Section 47 of the POEO Act as a result of existing scheduled activities, and is a scheduled premise for the purposes of the POEO Act.

4.2.1 Environment Protection Licence

The facility operates under an Environmental Protection Licence (EPL) No. 11714 for Scheduled Activities involving "Printing, packaging and visual communications waste generation". That EPL was last varied on 20 September 2022. The most recent licence amendments, with important amendments that reflected the significant works achieved by the facility to reduce noise and air emissions. The key updates included updates to the licenced emission points reflecting the installation additional pollution reduction equipment (Megtec RTO) that has successfully reduced point source odour emissions.

Part 2 of the EPL currently includes air concentration limits at two (2) air emission monitoring points, being:

- **Point 3** – the Wet Scrubber; and
- **Point 4** – the Megtec RTO.

The EPL presently requires the fume from the Deco Area Stack outlet to be redirected to the Regenerative Thermal Oxidiser (licence monitoring point 4) identified in the table at Condition P1.1. As such, that emission point is not included on the current EPL.

Noise monitoring is also required at the nearest sensitive receiver in Kolodong Road (Point 5). **Figure 4.1** identifies the applicable noise limits applying to the premise.

Time period	Measurement parameter	Measurement frequency	Noise level dB(A)
Day	LAeq (15 minute)	n/a	40
Evening	LAeq (15 minute)	n/a	40
Night	LAeq (15 minute)	n/a	40

Figure 4.1: Existing noise limits (EPL 11714)

Proposed Amendments

It is expected that the current EPL will be amended to reflect the proposed changes to emission points as a result of the proposed development. This is expected to include four (4) new licenced emission points (stacks) at the Aluminium Furnace, Casting Line, Rolling Mill and Annealer. The location of proposed stacks are shown in Figure 4.2 on the following page.

It is also expected that administrative amendments would also be made in the updated EPL. In particular, it is proposed that:

1. Condition U1 (Pollution Reduction Study 4 - Review of Pollution Control Equipment and Operational and Management Practices – Odour) is deleted following completion of that study in December 2021 and subsequent installation of the Megtec RTO.

2. Condition U2 (Proof of Performance Emission Testing Requirements) is deleted following completion of that study (21/2/2022) following commissioning of the Megtec RTO.

3. Part 2 is amended to reflect the three (3) additional emission points that will exist following installation of the casting line.

It is also proposed that the updated EPL includes retention of the Deco Area Stack as a licenced emission point with removal of any requirements to connect the Deco Area Stack to the RTO. As described in the AQIA, "*the Deco Area Stack in its current configuration is not adversely affecting the environment or community, it is reasonable to request the Deco Area Stack be reintroduced within the company's EPA licence as an identified emission point. Jamestrong accepts that annual monitoring and verification of compliance will be required as a part of their licence requirements on the Deco Area Stack*" (MJM, 2024).

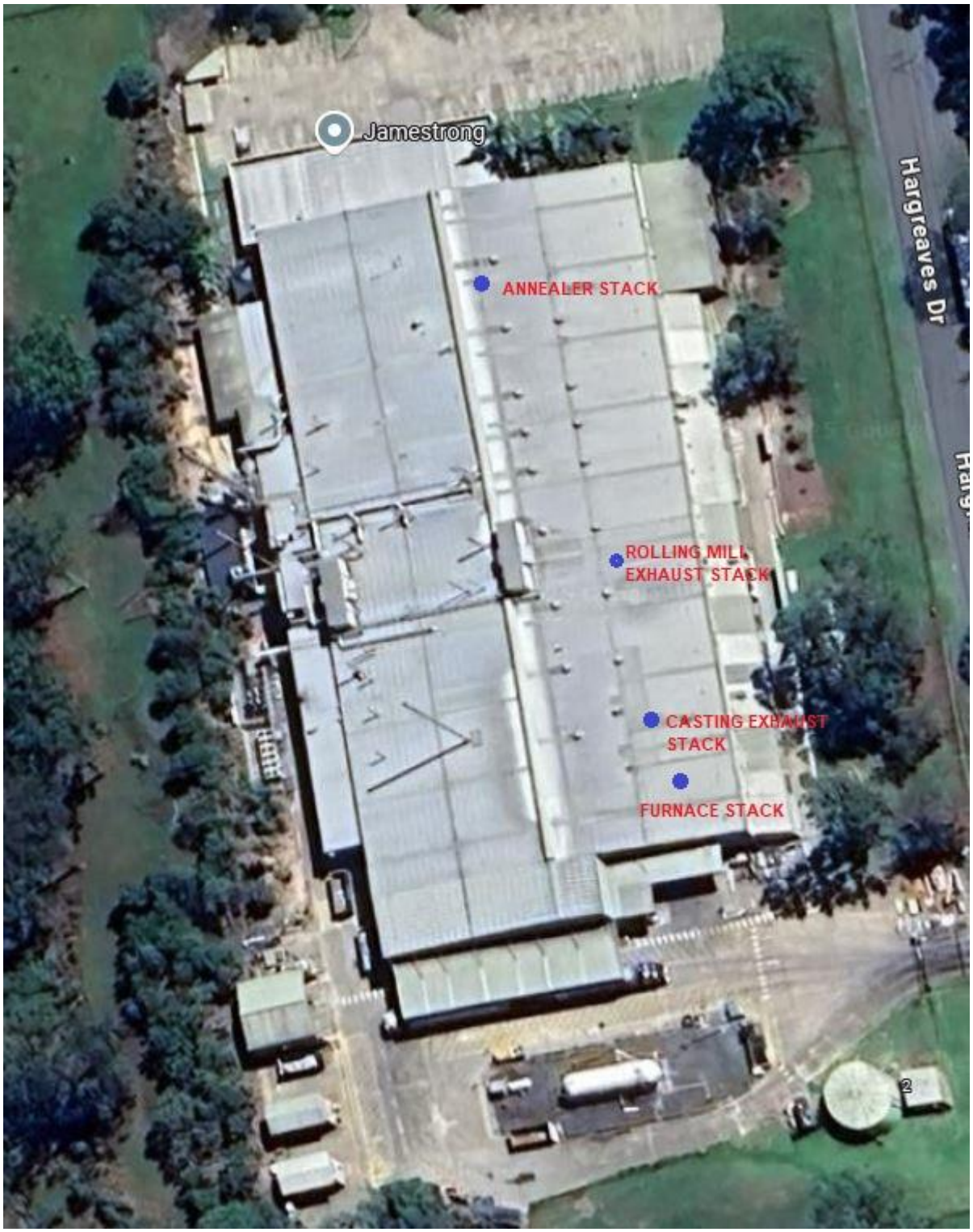


Figure 4.2: Proposed new stack locations associated with the casting line (Source: MJM, 2025)

4.3 Protection of the Environment Operations (Waste) Regulation 2014

The National Environment Protection (Movement of Controlled Waste between States and Territories) Measure (NEPM) covers the transport of controlled waste between Australian states and territories.

In NW, the requirements of the NEPM are implemented through the Protection of the Environment Operations (Waste) Regulation 2014 ("Waste Regulation"). Schedule 1 of Waste Regulation identifies waste that is "trackable waste" for the purposes of transporting waste with and outside of NSW.

Dross is a class 4.3 Dangerous Good (UN Code H4.3) with the following characteristics described in Part 3, Schedule 1 of the Waste Regulation:

> ***Substances or wastes which, in contact with water, emit flammable gases***
> *Substances or wastes which, by interaction with water, are liable to become spontaneously flammable or to give off flammable gases in dangerous quantities.*

While dross is not specifically listed in Schedule 1, Parts 1 and 2, the waste dross would have the hazard characteristics described in Part 3 and would be trackable.

It is expected that Part 4 of the Waste Regulation would apply to the transport and associated reporting of trackable waste from the facility, including provisions relating to transport of waste interstate. Queensland is a *Participating State* for the purposes of the NEPM, and Waste Regulation. The corresponding requirements of the NEPM and are implemented in QLD by the QLD Department of Environment and Science (DES) who provide the appropriate approvals for transport and receival of waste from NSW to QLD.

4.4 Public Health Act 2010 & Public Health Regulation 2022

The proposed development involves commissioning of two (2) existing cooling towers at the eastern side of the existing building. Cooling towers would be subject to registration and regulation by Midcoast Council under the *Public Health Act 2010* & Public Health Regulation 2022.

It is expected that those cooling towers would be registered with Council's Environmental Health department following installation. A Risk Management Plan (RMP) would be prepared to document the risks and the recommended control strategies for Legionella.

Photo 4.1: Existing cooling towers to be connected to the Casting Line and commissioned following registration with Council (Street View)

4.5 Environmental Planning Instruments

4.5.1 State Environmental Planning Instruments

State Environmental Planning Policies relevant to the proposal are considered in Table 4.4.

Table 4.4: Relevant State Environmental Planning Policies

SEPP / Chapter	Relevance to the proposal
State Environmental Planning Policy (Industry and Employment) 2021	
Chapter 3 – Advertising and Signage	N/A The proposal does not involve any advertising or signage.
State Environmental Planning Policy (Resilience and Hazards) 2021	
Chapter 2 – Coastal Management	The subject site is not mapped as being within a Coastal Management Area. The site is not located in the proximity area to either littoral rainforest or coastal wetlands mapped under the SEPP.
Chapter 3 – Hazardous and Offensive Development	There will be no storage of dangerous goods exceeding any screening thresholds under the Guideline, applying SEPP 33. The proposed development does not involve potentially hazardous or offensive development. Chapter 3 is considered further in Section 4.5.2.1 below.
Chapter 4 – Remediation of Land	Chapter 4 requires that contamination and remediation be considered when determining a development application, specifically: (1) A consent authority must not consent to the carrying out of any development on land unless: (a) it has considered whether the land is contaminated, and (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable after remediation) for the purpose for which the development is proposed to be carried out, and (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose. The land is not identified as contaminated land and is not land under investigation in relation to potential contamination. For the purposes of considering Clause 4.6 of the SEPP, there is no information to suggest that the site is not suitable for the proposed land use with regard to the presence of soil contamination in its current state.
Other SEPPs	
State Environmental Planning Policy (Biodiversity Conservation) 2021	The proposed development does not require any works that would result loss of native vegetation including koala habitat. As such, the there are no relevant provisions under the SEPP.

SEPP / Chapter	Relevance to the proposal
State Environmental Planning Policy (Primary Production) 2021	The proposal is unlikely to have adverse impacts on water quality in the Manning River or tributaries subject to the adoption of appropriate water quality safeguards for surface water. The proposal does not have potential for other impacts to aquaculture or land-based aquaculture facilities. As such, the development is unlikely to have an adverse effect on oyster aquaculture and would not require notice of the application to be given to the Secretary of the Department of Industry under Part 2.5 of the SEPP.
State Environmental Planning Policy (Planning Systems) 2021	The site is not a State Significant Development Site for the purposes of Schedule 2 of the SEPP. The proposal is not of a type, size or capacity that would be considered State or regionally significant development as described in Schedules 1 and 6 of the SEPP.
State Environmental Planning Policy (Transport & Infrastructure) 2021	Traffic – Section 2.122 The proposed development does not involve any significant traffic generation that would be considered traffic-generating development for the purposes of Schedule 3 of the SEPP.

4.5.2 State Environmental Planning Policy (Resilience and Hazards) 2021

4.5.2.1 Chapter 3 Hazardous and Offensive Development

The objective of Chapter 3 Hazardous and Offensive Development links the permissibility of an industrial proposal to its safety and pollution control performance. It aims to ensure that the merits of proposals are properly assessed in relation to off-site risk and offence before being determined.

Potentially Hazardous Industry

Chapter 3 applies to any proposals which fall under the definition of "potentially hazardous industry". If a development falls within the definition of a "potentially hazardous industry", then the proponent must prepare, or cause to be prepared, a Preliminary Hazard Analysis (PHA).

Chapter 3 provides the definition of a "potentially hazardous industry" as a site which holds quantities of dangerous goods in excess of the screening threshold levels prescribed within the NSW Department of Planning document entitled "*Applying SEPP 33*" (January, 2011).

Below provides a summary of the Dangerous Goods likely to be stored on the site as a result of the casting line development and the relevant thresholds under *Applying SEPP 33.*

Table 4.5: Dangerous Goods and Screening Thresholds

Material	DG Class	Quantity	Screening Method	Threshold
Aluminium Dross	Class 4.3	1 tonne*	Table 3	1 tonne
Acetylene	2.1	3 bottles	Figure 6 (if >100kg)	>100kg
Oxygen	2.2	3 bottles	Excluded	
Argon	2.2	Bulk Store (existing)	Excluded	
LPG (above ground)	2.1	Bulk Store (existing)	Table 3	10 tonnes
Pyroflux	6.1	Variable	Table 3	1 tonne

* Dangerous Goods storage protocols are to be reviewed by a DG consultant as part of normal operating procedures. Quantities of aluminium dross would be monitored and removed before quantities exceed 1 tonne.

Therefore, the proposed development does not require storage of dangerous goods in quantities that exceed the screening thresholds and is not considered to be "potentially hazardous development" in its own right.

Potentially Offensive Industry

In deciding if a proposal is 'potentially offensive industry', it is necessary to determine whether, in the absence of safeguards, the proposal would emit a polluting discharge which would cause a significant level of offence. As described in *Applying SEPP 33,* the following be considered:

- Does the proposal require a licence under any pollution control legislation administered by the DECCW or other public authority? If so, the proposal should be considered potentially offensive.
- If such a pollution control licence or approval is not required, does the proposal cause offence having regard to the sensitivity of the receiving environment?

The proposed development involves alterations to an existing premise that is a scheduled premise regulated by the EPA with limits imposed on the premises to ensure that the activities do not cause significant impacts (or offence) to the amenity of the neighbourhood as a result of noise or air emissions.

While the proposed development would be regulated under the existing EPL, it is noted that the process line (in itself) does not meet the licencing thresholds for Scheduled Activities in Schedule 1 of the POEO Act and would not be considered "potentially offensive".

Applying SEPP 33 provides the following guidance on the application of SEPP R&H to alterations to existing development:

> *"If the proposed use or modifications are considered potentially hazardous or potentially offensive in their own right, then SEPP 33 (now SEPP R&H) applies*.
>
> *SEPP 33 would also apply if the proposed modifications are not potentially hazardous in themselves, but interact with the existing facility in such a way that cumulative hazards (or offence) from the existing facility may be significantly increased. This may in many cases be a matter for judgement by the consent authority".*

Potential noise and air emissions are capable of complying with the current limits prescribed in the EPL. As such, the proposal is capable of incorporating mitigation measures to ensure that the cumulative levels of offense would not significantly increase. The proposal would not be potentially offensive for the purposes of Chapter 3 of SEPP R&H.

4.6 Greater Taree Local Environmental Plan 2010

The site is in the Greater Taree Local Government Area and is zoned *E5 – Heavy Industrial* under the provisions of *Greater Taree Local Environmental Plan 2010* (LEP). Immediately surrounding land is also zoned either *E5 Heavy Industrial* or *E4 – General Industrial* (**Figure 4.3**).

Figure 4.3: LEP Land Use Zone Map (NSW Spatial Viewer)

The proposal is for alterations to an existing *industry.* The proposed development would not require significant separation from other development because of the nature of the processes involved (i.e. hazardous or offensive development) and is unlikely to be characterised as *heavy industry*. The development (casting line) is therefore most appropriately characterised as a *general industry.*

Development for the purposes *general industry* is permitted on land zoned E5 zone with the consent of Council. *Heavy industry* is also permitted with the consent of Council.

Clause 2.3(2) of the LEP states that:

> *"The consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone."*

The objectives of the E5 zone are:

- *To provide areas for industries that need to be separated from other land uses.*
- *To ensure the efficient and viable use of land for industrial uses.*
- *To minimise any adverse effect of industry on other land uses.*
- *To encourage employment opportunities.*
- *To support and create opportunities for heavy industrial development with access to transport and infrastructure networks.*

The first three objectives related to strategic planning principles and the allocation of industrial land is separated from land uses that are sensitive to the impacts associated with industrial activities (i.e. noise and air) to maintain viable employment generation opportunities.

In relation to the fourth objective, the proposed development results in significant employment opportunities through the manufacturing of products that are currently soured from overseas. It is expected that the new manufacturing process line will increase the local employment capacity of the facility by around 12 full time positions.

The employment generating potential is recognised in the recent allocation of funding from the NSW Government's Regional Job Creation Fund.

The proposed development promotes the relevant objectives of the E5 zone.

4.6.1 Development Standards and Provisions

Part 4 of the LEP includes the Principal Development Standards that apply to development on land covered by the Plan. There are no relevant standards in Part 4 of the LEP.

Table 4.6 below provides a summary of the relevant provisions in Part 5 (Miscellaneous Provisions) and Part 7 (Additional Local Provisions) of the LEP.

Table 4.6: LEP Compliance Table

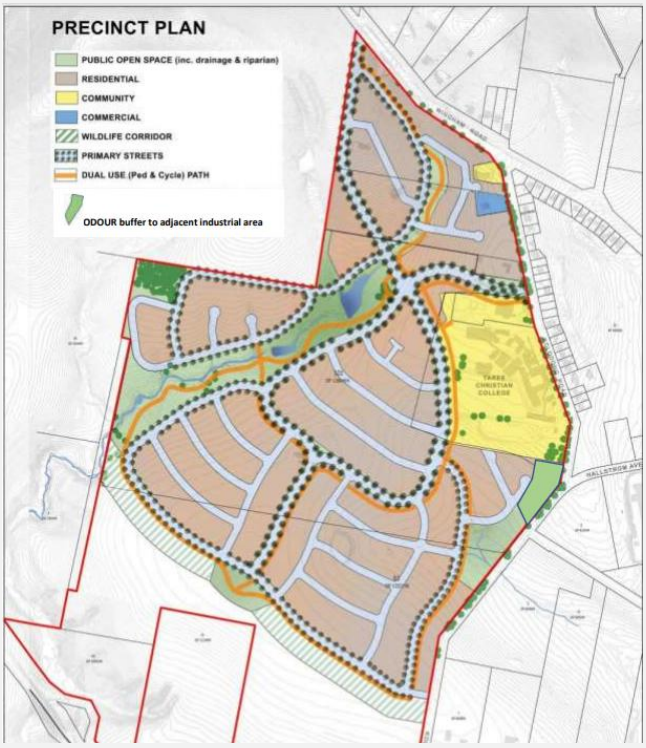
Clause	Control	Proposal
Part 5 Miscellaneous Provisions		
5.10 Heritage Conservation	Heritage Assessment	The site is not identified as an item of Environmental Heritage and is not located in proximity to any heritage items.
5.21 Flood Planning	Flood Planning Area	The site is not considered to be a Flood Planning Area for the purposes of Clause 5.21.
Part 7 Additional Local Provisions		
7.1 Acid Sulfate Soils	Class 5	The site is identified not mapped as containing ASS for the purposes of Clause 7.1.
7.3 Earthworks	Consideration of matters (a) to (g)	The proposed development does not involve any earthworks.
7.11 Essential services	Consideration of matters (a) to (e)	All essential services are available to the existing building and appear capable of servicing the proposed development. These include electricity, water and sewer. The development does not involve any additional discharges (trade waste) to sewer with any cooling water contained within recirculating systems.

4.7 Greater Taree Development Control Plan 2010

Greater Taree Development Control Plan 2010 (DCP) applies to the land. The applicability of each part of the DCP is considered in Table 4.7 below

Table 4.7: DCP Analysis

DCP Part		Relevance
1	**Name of Plan**	Confirms application of the DCP to all areas covered by the *Greater Taree Local Environmental Plan 2010*.
A	**Preliminary Information**	Includes requirements for all development applications including site plan, Statement of Environmental Effects, site analysis and specialist reports where relevant. The application is accompanied by the plans and a SoEE considering the environmental impacts of the proposal. Specialist reports accompany the DA and are listed in Section 3.1.1.
B	**Character Statements**	N/A
C	**Subdivision Requirements**	N/A
D	**Environmental Requirements**	Provides information on environmental matters that may need to be addressed in the design of development. Sections D1, D3 and D4 are not relevant to the proposal. Any future residential development on land west of Kolodong Road is subject to considerations under Part D – Environmental Buffers of the Greater Taree Development Control Plan 2010, which has the objective to ensure the unhindered operation of industry in the area whilst still providing for the housing needs of the community. The DCP contains buffers and acoustic treatments to minimise impacts from noise, air and/or odour pollution.
E	**Flooding**	Section E4.7 of the DCP applies to recreation and non-urban uses in flood planning areas. The site is not flood prone and there are no relevant controls in Part E of the DCP.
F	**Heritage**	The proposal is not a heritage item or located in a Heritage Conservation Area. There are no relevant controls in Part F of the DCP.
G	**Car Parking and Access**	See Section 4.7.1 below
H	**Residential Requirements**	N/A
I	**Commercial Requirements**	N/A.

DCP Part		Relevance
J	**Rural & Environmental Zone Requirements**	N/A
K	**Industrial Requirements**	See Section 4.7.2 below.
L	**Local Area Plans**	The site is not located in an area identified in Chapter L of the DCP. Land to the west of the site is identified as the Kolodong Precinct in Part L13 of the DCP. Relevantly, an "odour buffer" is required to be maintained to exclude residential development from the affected area south of the Taree Christian College. The proposed odour buffer increases separation between the Jamestrong Facility and any residential development in the Kolodong Precinct, reducing potential for land use conflicts associated with both noise and air quality.  **Figure 4.4:** DCP Precinct Plan showing the odour buffer and master plan for residential development in the Kolodong Precinct
M	**Site Waste Minimisation & Management**	Contains the controls for the design of waste management facilities for all forms of development. The site operates under an EPL for waste generation with all waste management processes regulated by the NSW EPA. Council's local development controls are superseded by the requirements of then POEO Act and Safe Work requirements for handling and storage of dangerous goods.

DCP Part		Relevance
N	**Landscaping Requirements**	N/A
O	**Signage & Advertising requirements**	N/A

4.7.1 Part G: Car Parking & Access

Part G1.3 of the DCP provides parking requirements for specific land uses. The DCP requires any new consent or consent to alter, enlarge, convert or increase the capacity of any building or the use of any land to make provision for off-street vehicular parking in accordance with the Table in Section G1.3 of the DCP.

Industry is specifically listed in the DCP Table which prescribes a parking rate of 1 space / 70m^2 of Gross Floor Area (GFA). While the proposal would result in an increase to employment at the facility, the proposed development does not increase GFA or change the existing industrial 'use' of the existing building for the purposes of calculating car parking requirements. As described in Section G1.3(3) of the DCP, *"If the alteration does not result in increased floor space and the use of the building is not significantly changed, then no provision for parking will be required".*

The site contains a large employee and visitor car park at the northern side of the building (adjacent to offices). There are no existing parking constraints or deficiencies that would make the site unsuitable for the development.

Photo 4.2: Existing employee and visitor car park (Streetview)

4.7.2 Part K: Industrial Requirements

Part K of the DCP provides detailed guidelines for industrial land and buildings within the Greater Taree Local Government Area. The proposed development is contained within the overall footprint of the existing industrial facility. The proposal will not change the appearance of the site.

The proposal will not require clearing of native vegetation or result in changes to any building setbacks on site. The proposed development promotes the objectives of the DCP through high-quality industrial growth and the facilitation of economic and orderly industrial development.

4.8 Developer Contributions Plans and Planning Agreements

4.8.1 Planning Agreements under Section 7.4 of the EP&A Act

The site is not affected by any registered Planning Agreements for the purposes of Section 7.4 of the EP&A Act. Furthermore, the developer has not offered to enter into any Planning Agreements relating to the land or proposed development.

4.8.2 Developer Contributions Plans

Development in the former Greater Taree LGA is subject to either:

a) Greater Taree Section 94 Contributions Plan 2016 (Section 94 plan); or

b) Greater Taree Section 94 Contributions Plan 2016 (Section 94A plan).

The Section 94 plan authorises the Council to impose conditions requiring contributions on development consents or complying development certificates under Section 7.11 (formerly s94) of the EP&A Act. The Section 94 plan applies to the following types of development:

- Residential development;
- Heavy haulage developments that will have significant impacts on rural roads;
- Non-residential development in the Taree CBD area that is deficient in the provision of on-site car parking.

The proposal does not fit into any of the categories above. As the development has a development cost greater than $200,000, the proposal may therefore be subject to a fixed rate contribution under Section 7.12 (formerly s94A) of the EP&A Act. The Section 94A plan prescribes the following monetary contribution rates for development covered by the plan.

For the purposes of Section 7.12 of the EP&A Act, the proposed cost of development is determined in accordance with Section 208 of the EP&A Regulation. Table 4.8 below summarises the expected costs of carrying out the development and preliminary estimate of Section 7.12 contributions that may be levied under the Section 94A plan.

The below summary excludes costs associated with the construction of foundations which were completed under a separate DA.

Table 4.8: Summary of Development Costs (exc completed foundation work)

Element	Cost Estimate
Engineering and Installation	$687,894
Manufacturing Equipment	$1,422,536
Ancillary work	$150,444
Environmental Impact Assessment, Approvals and other costs	$132,416
Total	**$2,393,290**
Estimated s7.12 contribution (@1% of development cost)*	**$23,932.90**

** Estimate only. Actual contributions to be calculated by Council*

5. LIKELY ENVIRONMENTAL, SOCIAL & ECONOMIC IMPACTS

5.1 Air Emissions

MJM Environmental was commissioned to perform an Air Quality Impact Assessment (AQIA) for odour, VOC, and casting line analytes. The AQIA included Ausplume dispersion modelling of the emissions in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (NSW EPA, 2022).

The dispersion models were found to maintain compliance with the ground level concentration Impact Assessment Criteria referenced in the *Approved Methods*. Importantly, the model included consideration of VOC and odour emissions from the existing Deco Area Stack and all other existing emission sources.

Figure 5.1 shows odour ground level concentrations at the sensitive receptor locations and the boundary locations based on an averaging period of 1 hour and as the 99th percentile of dispersion model predictions as per the EPA's requirements for a Level 2 AQIA.

It is noted that Mid Coast Council have approved residential development of land west of Kolodong Road. The development may result in housing developments in the area closer to Jamestrong. The approximate area where rezoning and development is proposed to take place is outlined with a pink boundary in Figure 5.1.

As depicted in Figure 5.1, the modelled 99th percentile ground level odour concentration of 0.6 OU within the proposed residential development, which is well below the Impact Assessment Criteria of 2.0 OU at ground level.

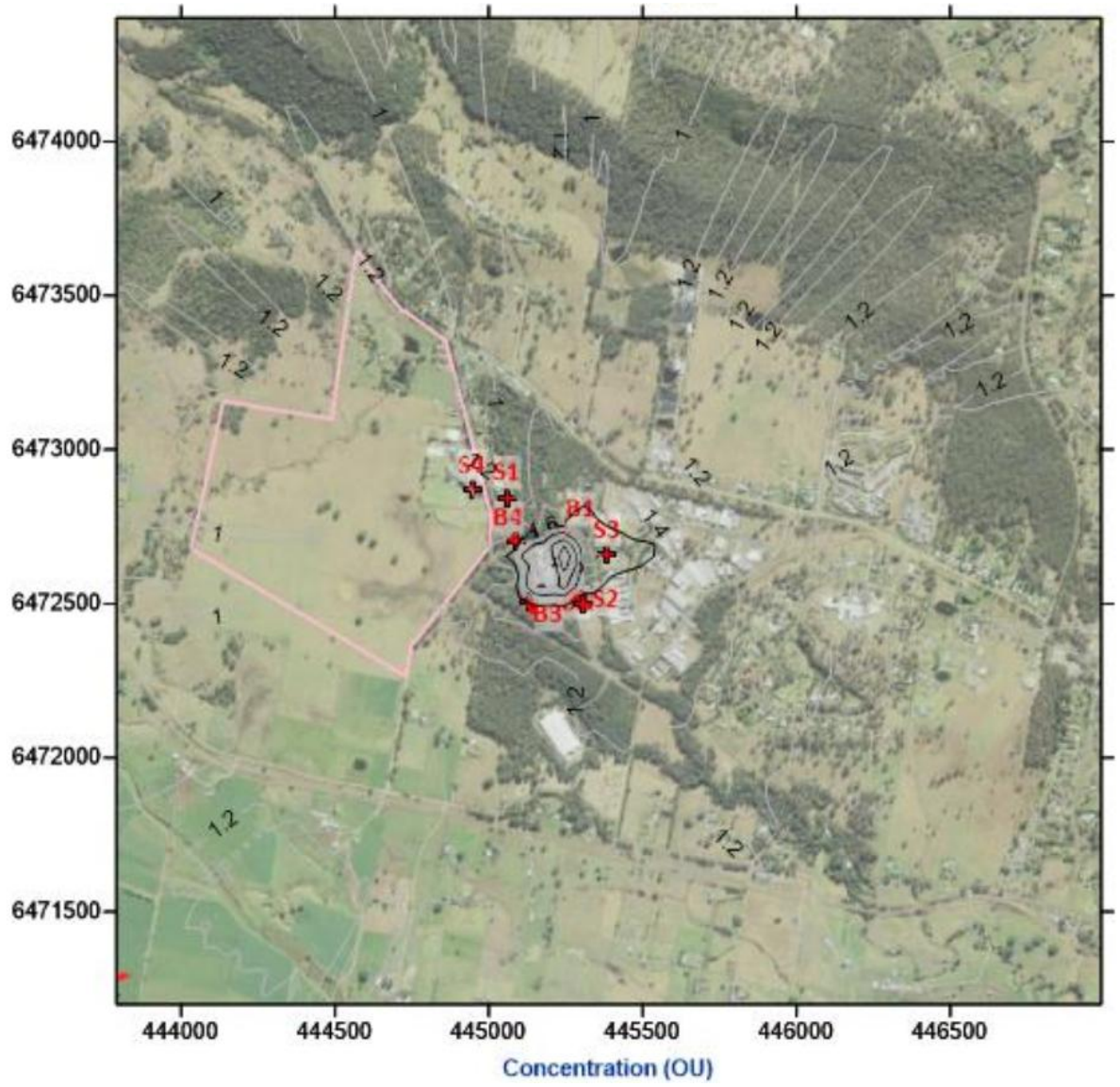


Figure 5.1: Odour isopleths based upon an averaging period of 1 hour and as the 100th percentile of dispersion model predictions.

5.2 Noise Emissions

Noise emissions from the facility following commissioning of the casting line are described in a Noise Impact Assessment (NIA) (EMM, 2024). The NIA was prepared with reference to the Noise Policy for Industry (NPfI) 2017 and Approved methods for the measurement and analysis of environmental noise in NSW (Approved methods).

As described by MJM (2025), the NPfI provides a methodology for the assessment of operational noise from existing industrial sites. The NPfI acknowledges that some industrial sites were designed for higher allowable noise emissions than those outlined in current NSW noise policy and may have been in existence before neighbouring noise-sensitive developments.

Section 6.1 of the NPfI states that:

- *The project noise trigger levels should not be applied as mandatory noise limits. The project noise trigger level is the level used to assess noise impact and drive the process of assessing all feasible and reasonable control measures.*

- *Where a development proposal involves a discrete process, and premises-wide mitigation has or is to be considered outside of the development proposal, a project noise trigger level for noise from new/modified components (not the whole site) of the operation may be set at 10 dB(A) or more below existing site noise levels or requirements. This approach means that the increase in noise from the whole site is minimised and provides scope for existing components to achieve noise reductions over time.*

Noise Impact Assessment

Conclusions of the NIA (EMM, 2024) are summarised by MJM (14/1/2025) generally as follows:

- With the use of the logging data, operator attended measurement and existing site assessment, it has been determined that the site currently operates at the approved EPL noise limit of 40 dB.

- Based on the assumptions provided in the NIA, noise from the proposed Aluminium Casting Plant and Existing Plant are predicted to meet the current EPL noise limits.

- The location identified as R10 is currently an empty open field of a proposed housing development. The housing development has stated within their Council Condition 42, that the proposed housing development consent requires installation of a timber noise wall at the Kolodong road boundary. The proposed timber barrier, will further reduce the predicted noise at R10.

- To avoid any increase to existing site noise levels, the new plant introduced to site would need to be at least 10 dB quieter than all other existing plant at the site. This follows guidance in Section 6.1 of the NPfI.

- Jamestrong are committed to implementing noise mitigation measures to reduce the noise from the new plant so that it is 10 dB quieter than all other plant operating in the facility, such that they can comply with their current license limit of 40 dB during the day, evening, and night periods.

Mitigation Measures

In order to comply with the Facility's noise licence limits of 40 dB at the closest sensitive receptor, Jamestrong proposes the following methods of control;

- Installation of sound proofing panelling around the proposed slug presses.

- Installation of anti-vibration pads under the proposed slug presses.

- Anti-vibration pads will be installed into the foundation, to decrease any possible noise or vibration.

- Proof of noise management from the proposed Aluminium Casting plant, during commissioning, through onsite noise measurements.

- Proof of license compliance during commissioning of the Aluminium Casting plant.

Figure 5.2 depicts existing site noise contours in relation to the nearest sensitive receivers. Subject to implementing reasonable and feasible noise reduction measures (such that emissions from the casting line are 10dB less than current emissions), it is expected that the proposed development would not result in any changes to the existing noise contours or exceedance of noise limits at the nearest sensitive receiver.

Figure 5.2: Existing noise contours (EMM, 2024)

5.3 Environmental Impact Summary

The potential environmental impacts of the proposal are considered in Table 5.1.

Table 5.1: Potential Environmental Impact Summary

Matter	Potential Impact
Water	The proposal will not alter any drainage patterns and is not located in an area that is affected by drainage issues. Chemical and other dangerous goods storage would have some potential to cause water pollution if not stored appropriately. <u>Mitigation Measures</u> Any dangerous goods or other chemicals are to be stored within existing storage areas, including existing bunded storage areas for chemicals, to ensure that chemical spills do not enter stormwater systems.  **Photo 5.1:** Existing bunded storage areas
Waste Management	As described in Section 0, the proposed development results in some additional waste generation compared to the existing facility. Waste includes discarded slugs and waste aluminium offcuts, as well as aluminium dross. Waste aluminium would be collected and stored within existing aluminium recycling streams for waste aluminium containers. Waste dross is to be stored within an existing storage room that was constructed for the purposes of storing waste dross from the former casting line. Waste dross is a class 4.3 dangerous good and requires transport to specialised recycling facilities. High Quality Waste Treatment Services (Yatala, QLD) presently have the capabilities to transport and recycle waste dross produced by the facility.

Matter	Potential Impact
	Mitigation measures • Separation of recyclable materials (aluminium) for disposal at a waste management facility. Aluminium waste has a commercial value and is presently collected for sale through existing waste streams. The facility has capacity to accommodate any additional; waste produced by the casting line. • Storage of Aluminium dross within a dedicated dross store. Specific protocols are required for the storage of dross in accordance with Dangerous Goods storage guidelines and requirements of Safe Work NSW. Storage and handing protocols would be developed by a Dangerous Goods consultant prior to the commencement of operations. • Aluminium dross is transported to specialised waste processing facilities (i.e. High Quality Waste Treatment Services).
Air Quality and Climate Change	The premise is subject to existing air concentration limits specified in the EPL. The proposal does not have the potential to cause air emissions that would exceed the limits prescribed in the EPL or ground level concentration limits of relevant pollutants, including odour (refer to discussion above).
Noise	Noise impacts will remain regulated by the existing noise limits contained in the EPL. As described above, Jamestrong are committed to implementing noise mitigation measures to reduce the noise from the new plant so that it is 10 dB quieter than all other plant operating in the facility, such that they can comply with their current license limit of 40 dB during the day, evening, and night periods.
Effluent Disposal	The subject site is serviced by reticulated sewerage. The proposed development will not result in increased effluent loads or Trade Waste discharges to the sewer.
Flooding	The site is not located within a flood planning area.
Flora & Fauna	No native vegetation will be removed, and the proposal does not have potential for any impacts to species or communities listed under the *Biodiversity Conservation Act 2016.*
Aboriginal Cultural Heritage	Based on the disturbed nature of the site (existing facility), the presence of artefacts and/or sites of Aboriginal heritage value is unlikely.
Environmental Heritage	The site does not contain any known items of environmental heritage.
Traffic	No significant traffic will be generated as a result of the proposed development. While the casting line requires importation of aluminium ingot from Tomago Aluminium, the casting line results in an equivalent reduction in the delivery of aluminium slugs. Any additional traffic would be limited to:

Matter	Potential Impact
	• Waste removal contractors removing aluminium dross on an irregular basis (as required) • Additional employee visitation compared to existing. The casting line would be operated over two shifts and there is significant capacity in the local road network to accommodate any employee traffic. • Delivery of materials and LPG. These deliveries would generally be completed in conjunction with existing material deliveries. The site is serviced with existing loading docks and heavy vehicle access is separated from employees and visitor parting. The existing access and loading arrangements are adequate to accommodate all vehicle movements associated with the proposed development.
Bushfire	The land within the site and surrounds is mapped as bushfire prone land for the purposes of Section 10.3 of the EP&A Act. As land within the site is mapped as bushfire prone land, the aim and objectives of the New South Wales Rural Fire Service guideline entitled *Planning for Bush Fire Protection 2019* (PBP) apply to the development. The proposal is for internal manufacturing processes. The proposal does not involve introduction of any additional hazardous materials (that would present a hazard during a bushfire) or reduce any existing Bushfire Protection Measures. The proposal would be consistent with the relevant objectives of PBP.
Social & Economic	The proposal has been partially funded by a $240,000 grant from the NSW Government's Regional Job Creation Fund. The works are critical to the realisation of the funded project that will eventually result in a significant increase to local employment. The development supports the retention and creation of employment in the area, with positive social and economic impacts both locally.

6. SUITABILITY OF THE SITE & THE PUBLIC INTEREST

The proposal reintroduces a significant manufacturing industry that operated from the site prior to decommissioning in 2014. The result of the proposed development will be a significant increase in local employment while securing a supply of high-quality products that are presently sourced from international manufacturers.

The significance of the project is reflected in the previously issued grant of $240,000 from the NSW Government's Regional Job Creation Fund. The commencement of manufacturing is essential to the efficient delivery of the regional employment outcomes and the public interest objectives of the Regional Job Creation Fund.

The site is located on land that is zoned E5 Heavy Industry, with specific zone objectives to "provide areas for industries that need to be separated from other land uses", and "to ensure the efficient and viable use of land for industrial uses". The proposed industrial activity is capable of operating within existing limits for noise and air emissions and there are no site constraints that would make the site unsuitable for the development. Approval of the development does not raise any issues contrary to the public interest.

7. CONCLUSION

This Statement of Environmental Effects has been prepared in relation to proposed use of an aluminium casting line within an existing industrial premises at 2 Hallstrom Avenue, Taree.

Jamestrong Precision Packaging Taree specialises in the manufacture of aluminium aerosol and beverage cans, producing approximately 120 million cans per annum. The proposal has been partially funded by a $240,000 grant from the NSW Government's Regional Job Creation Fund in recognition of the significant contribution to local employment.

The industrial premises is subject to an Environmental Protection Licence for Scheduled Activities under the *Protection of the Environment Operations Act 1997*. While the proposed development will require amendment to the current EPL (to include additional emission points), emissions from the premises maintain compliance with the ground level concentration Impact Assessment Criteria referenced in the *Approved Methods*.

Potential noise impacts have been assessed though a Noise Impact Assessment (EMM, 2024). The assessment provides mitigation measures that would assist with the reduction of noise emissions to be 10 dB quieter than all other plant operating in the facility, such that the facility can comply with the current license limit of 40 dB during the day, evening, and night periods. Compliance with noise limits would be reviewed during commissioning, through onsite noise measurements, and mitigation measures adapted or supplemented as necessary to maintain compliance with the EPL.

The development has been considered in relation to the relevant requirements of the *Greater Taree Local Environmental Plan 2010* and Greater Taree Development Control Plan 2010 (DCP). The development is generally consistent with those requirements, as far as they relate to the development.

There are not likely to be any significant environmental impacts associated with the proposal that cannot be mitigated through conditions of consent.

The site is suitable for the proposed development and the proposal is consistent with the public interest.