

Title: Development Application No. 49832/2016, Proposed Alterations & Additions to Existing Industrial Building on Lot 1 DP 816083 & Lot 22 DP 873845 98-112, 98 Wisemans Ferry Road, Somersby

Department: Environment and Planning



Report Purpose:

To enable the determination of a development application.

Applicant	CSR Hebel
Owner	CSR Panel Systems
Application Number	49832/2016
Description of Land	LOT: 22 DP: 873845, 98 Wisemans Ferry Road Somersby
Proposed Development	Alterations & Additions to Existing Industrial Building
Zoning	IN1 General Industrial
Site Area	48100m ²
Existing Use	Industrial building
Value of Works	\$28,412,632.00

Summary:

Application Type	Development Application – Local
Application Lodged	10/05/2016
Delegation level Reason for delegation level	Joint Regional Planning Panel

Advertised and Notified / Notified Only	Notified only
Submissions	One (1)
Disclosure of Political Donations & Gifts	No

Recommendation:

- A JRPP as consent authority grant consent to Development Application No 49832/2016 for Alterations & Additions to Existing Industrial Building on LOT 1 DP 816083 & LOT: 22 DP: 873845, 98 Wisemans Ferry Road Somersby subject to the conditions attached.
- B In accordance with Section 95(1) of the Environmental Planning & Assessment Act 1979, this consent shall be valid for a period of five (5) years.
- C The External Authorities and the submitter be notified of the JRPP's decision.

Assessment:

This application has been assessed using the heads of consideration specified under Section 79C of the Environmental Planning & Assessment Act 1979, Council policies and adopted Management Plans.

Background:

The subject site is currently zoned IN1 General Industrial under the Gosford Local Environmental Plan 2014 (GLEP 2014). The site was previously zoned 4(a1) – Industrial (General) in the Gosford Local Environmental Plan No.22 (LEP 22).

CSR Building Products Ltd (CSR) is seeking to extend the Hebel plant facilities which are currently situated on Lot 1 DP 816083, over and into part of the adjoining lot to the south, being Lot 22 DP 873845. Lot 22 is currently vacant; however a previous court approval exists for earthworks/hardstand which has been physically commenced (see below for details).

Lot 22 is a split lot. Part of the lot is adjacent to the M1 Motorway, however the proposal is only for the western section adjacent to the Wiseman Ferry Road, see figure 1. The lots will be consolidated in the future.

CSR Hebel factory has been operating on the site since 1989.



Figure 1: Site aerial photo (April 2015)

Previous DA's for Lot 1:

- DA10773 (1989) – proposed manufacturing plant;
- BA53998 (1989) – approval to build factory;
- DA16912 (1993) – storage shed;
- DA16912 (1993) – additions to existing factory;
- BA72515 (1993) – approval to build additions to existing factory.

Previous DA's for Lot 22

- **DA 34787 (2009)** – Council refused DA34787/2009 on 3 July 2008. DA34787 sought to expand the Hebel operation by construction of a 30,000m² concrete hardstand area. The proposal was considered to be contrary to the Somersby Plan of Management with regards to the impact on the *Prostanthera junonis* (Somersby Mintbush) habitat. A Species Impact Statement was also not provided with the application and the Department of Environment and Climate Change also refused to give concurrence to the proposal.
- The applicant lodged a S82A review on 18 September 2008 which was considered at the 7 July 2009 Council meeting of the former Gosford City Council. Council resolved to defer the matter until such time that the Department of Environment Conservation and Climate Change provided their concurrence.
- The applicant lodged an Appeal in the Land and Environment Court in response to the deferment.
- On 12 April 2010, the Land and Environment Court issued consent for earthworks and hardstand area and establishment of conservation area to protect the endangered plant species Somersby Mintbush (*Prostanthera junonis*).
- The court conditions have been provided as an attachment to this report (Appendix 6).

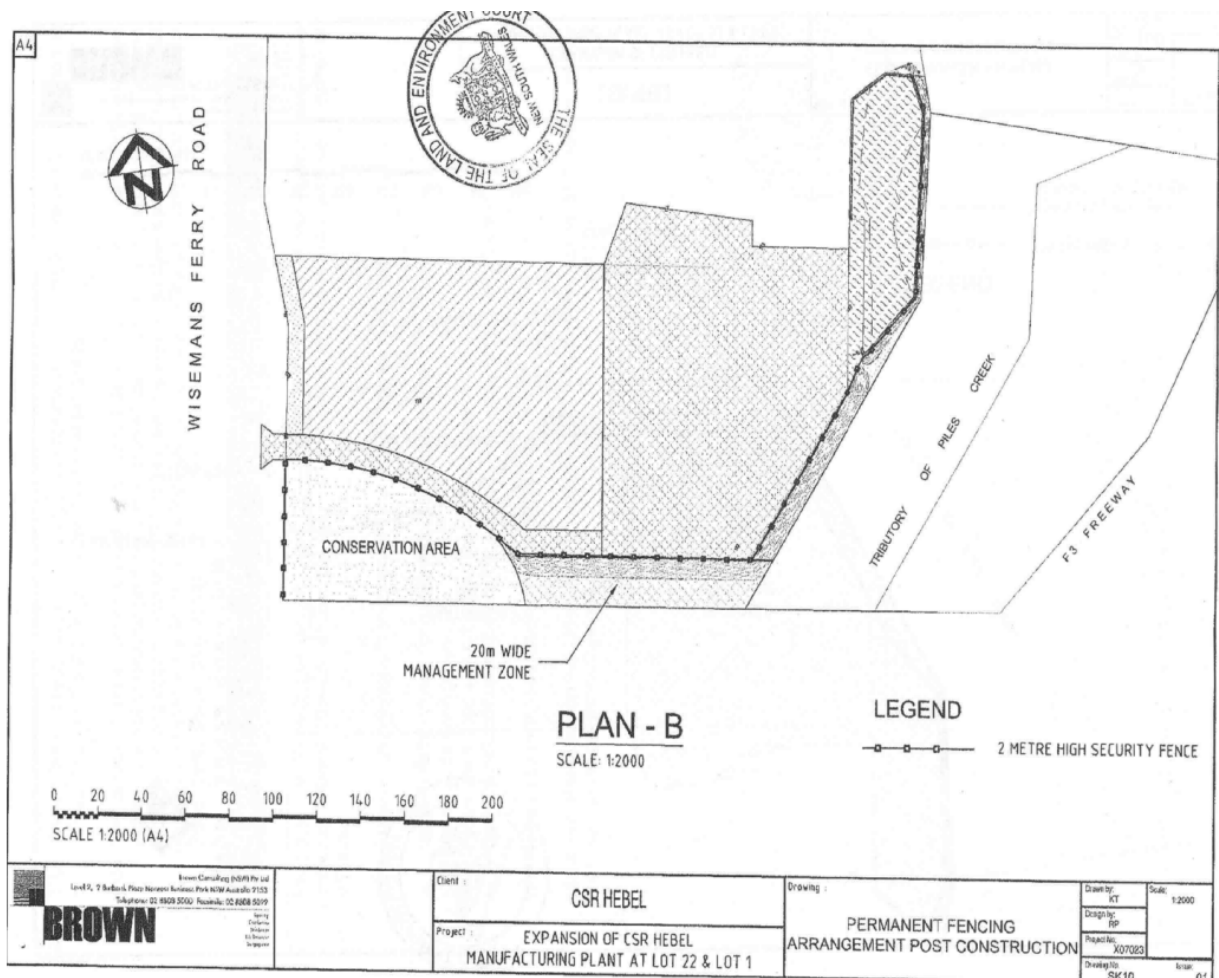


Figure 2: Court approved plan showing hardstand area and the required conservation area

In accordance with the court approval, the earthworks and hardstand area have physically commenced on Lot 22. The works undertaken include but are not limited to:

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- Registration of a Covenant over conservation area;
 - A tapered heavy duty vehicle crossing;
 - Redesign of the kerb and gutter around the crossing;
 - Road furniture and safety devices including fencing, signage, guide posts, chevrons, directional arrows and guard rails;
 - Piping of the open drain in the frontage of the site;
 - Obtaining Roads Act approval from Council;
 - Preparation and submission of four Sediment & Erosion Control Plans to satisfy the conditions; and
 - Installation of sediment and erosion control measures.

This has been confirmed with the submission of documentation. In addition the applicant has provided additional legal opinion which confirms that physical commencement has occurred.

Site & Surrounds

The site, known as LOT: 22 DP: 873845 98 Wisemans Ferry Road Somersby, is located within the Somersby Industrial Park (SIP). The CSR Hebel site is located on the eastern side of Wiseman Ferry Road. Adjoining development comprises industrial/manufacturing purposes including production of air conditioning and refrigeration units; measuring equipment for medical and veterinary purposes, and waste and recycling bins. Other uses on neighbouring sites in the SIP include forklift sales, a wholesale bakery, and a furniture warehouse.

The topography is relatively flat for the majority of the site. The site is sloping but at a negligible angle (less than 5 degrees) across the whole site from west to east. The site contains a large factory building with storage yard and associated car parking.

The site is identified as "bushfire prone land" on Council's bushfire maps. A Bushfire Assessment Report has been prepared by Newcastle Bushfire Consultants.

The 2010 Court approval gave consent for the construction of a hardstand area and earthworks which has commenced on the site. The approved plans also identified a conservation area in the south western portion of the site adjacent to Wiseman Ferry Road. The conservation area contains the area known to be a *Prostanthera junonis* (Somersby mintbush) habitat.

The Proposal

It is proposed to extend the existing Hebel manufacturing plant operating on Lot 1. The proposed development will extend over the adjoining site to the south (Lot 22). The proposal has a similar development footprint as the LEC approved development consent. The current application seeks to gain approval for the manufacturing plant on this hardstand area.

The proposal comprises on Lot 22:

- Construction of an production plant building including facilities for cutting, storage of raw materials and a boiler room;
- Hardstand storage areas and vehicle loading facilities;
- Two new driveways;
- On-site car parking – 50 additional spaces;
- An extended administration building;
- Staff amenities, and
- Landscaping.

The processes include raw materials, preparation works, mixing, pouring, curing, cooking and packaging.

An additional 24 staff will be required for the proposed expanded facility. It is proposed to continue to manufacture from the site 24hrs per day.

The existing facility is approximately 9,624sqm in size, while the proposed extension is approximately 10,911sqm, meaning the facility (plus extension) will be approximately 20,535sqm in size. The current production rate is 170,000 cubic metres. The proposed maximum capacity is 500,000 cubic metres.

The additional parking area will bring the total number of car spaces (including disabled parking) to 122 spaces.

Lot consolidation

The proposed development on Lot 22 seeks to expand CSR operations of the existing plant on the adjacent lot known (Lot 1 DP 816083). The two sites will share access, internal road network and stormwater controls. Consequently, it is recommended consolidation of the two lots into one allotment.

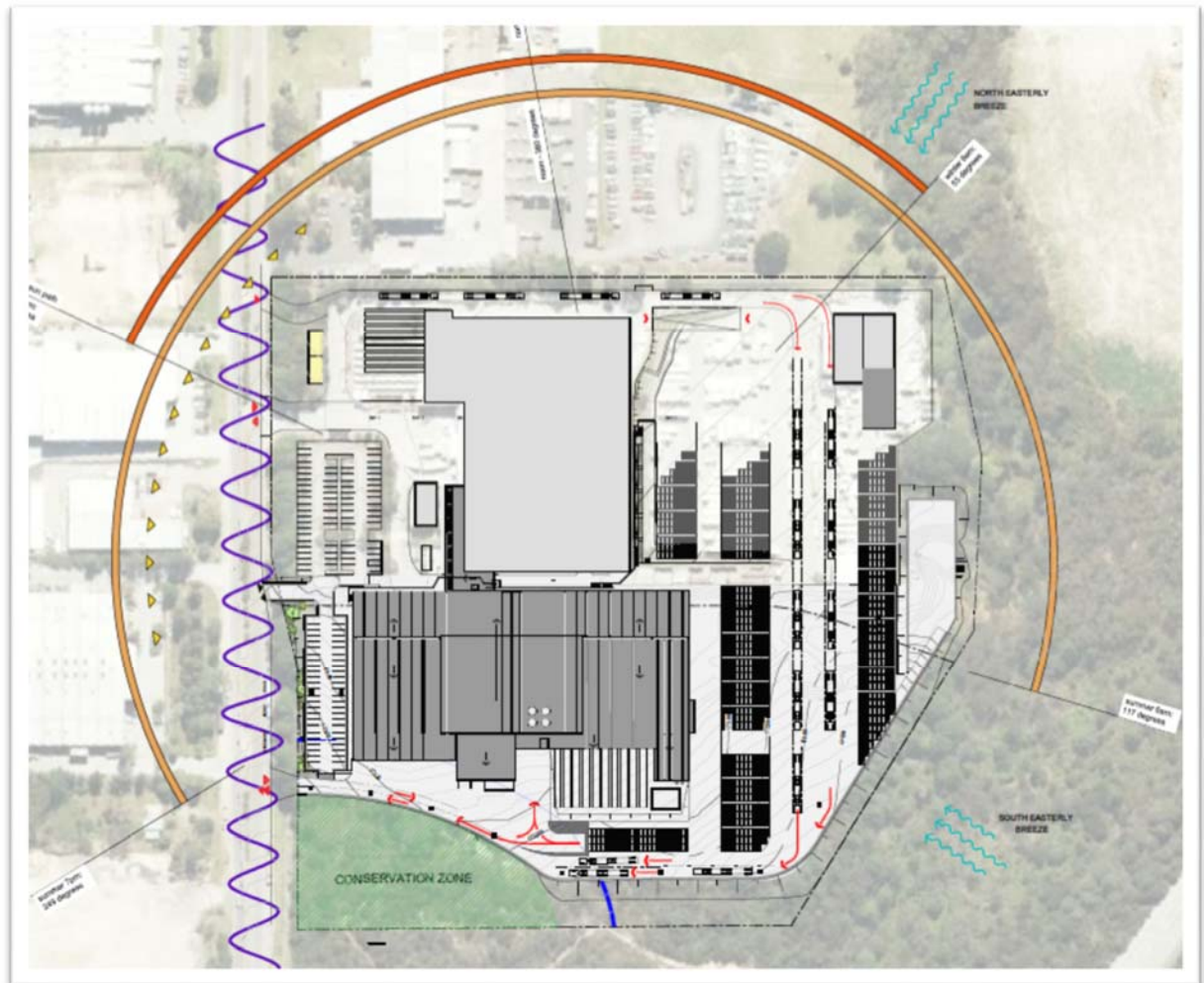


Figure 3: Proposed site layout

Applicable Planning Controls

The following planning policies and control documents are relevant to the development and were considered as part of the assessment.

- Environmental Planning & Assessment Act 1979 - Section 79C

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- Protection of the Environment Operations Act 1997
 - Threatened Species Conservation Act 1995
 - State Environment Planning Policy 33 – Hazardous and Offensive Development
 - Local Government Act 1993 - Section 89
 - Gosford Local Environmental Plan 2014 (GLEP 2014)
 - Gosford Development Control Plan 2013 (GDCP 2013)
 - Somersby Industrial Park Plan of Management

Permissibility

The subject site is zoned IN1 General Industrial under GLEP 2014. The proposed development is for the construction of an industrial building, administration office and storage of materials which is permissible in the zone with consent of Council.

Commonwealth Legislation

Environment Protection and Biodiversity Conservation Act 1999

The Somersby Mintbush is listed as endangered under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Under the EPBC Act, the approval of the Commonwealth Minister of the Environment is required if an action will, or is likely to significantly affected as part of previous DA approvals within the conservation area along the southern boundary of the site. The conservation area is required to be retained and maintained as part of the Court consent. The proposed development does not encroach onto the identified conservation zone.

NSW Legislation

Threatened Species Conservation Act 1995

The Somersby Mintbush (*Prostanthera junonis*) has been found on the subject site. The Somersby Mintbush is listed as an endangered species in Schedule 1 of the Threatened Species Conservation Act 1995. A conservation area was established through the Court consent and a Conservation Management Plan is in place to ensure that the conservation area is protected. The proposed development does not encroach onto the identified conservation zone.

The works have been designed to direct flows and potential contaminants from the development toward stormwater management systems. The impact on the conservation zone will be avoided. The natural water flows to the area were impacted by the previously approved earthworks (Court approved) and will not be further impacted upon by the proposal to build on top of the previously approved hardstand area. An assessment will have been undertaken regarding the water flows during the Court case.

Protection of the Environment Operations Act 1997

The existing Hebel facility has an environmental protection licence (EPL) issued under the Protection of the Environment Operations Act 1997 (EPL 3427). Prior to the commencement of any Hebel operations on the site, the applicant will need to liaise with the NSW Environment Protection Authority (EPA) to update the EPL, where applicable.

Water Management Act 2000

A watercourse is located to the east of the subject site. Noting the previous DA approved on the site was for earthworks and car parking the proposed works are at least 20m from the

bank of the watercourse. The watercourse is identified as a first order stream which requires a riparian corridor width of 10m either side of the top bank which was condition under the Court approved DA. An existing Environmental Protection Licence is in place and a condition is recommended to require this to be update to reflect the expansion of the facility.

The current proposal will be located on the hardstand (Court approved). A condition is recommended requiring the applicant to gain the required licence from the NSW Office of Water for the harvesting and reuse of stormwater for production processes and a Controlled Activity Approval under the Water Management Act 2000.

Environmental Planning and Assessment Act – Regulations 2000

Under Schedule 3 of the Regulations, cement works and concrete works are designated development under certain circumstances such as distance to a watercourse and/or production quantity. The current production rate of the existing CSR facility is 170,000 cubic metres of concrete blocks. The proposed maximum capacity is 500,000 cubic metres. The production capacity exceeds the designated development trigger values of >150tonne/day or 30,000/year. Additionally, the subject site is within 100m proximity of a natural waterbody. As such the original application was designated development and was assessed accordingly.

With regard to alterations and additions, clause 35 of Schedule 3 of the *EP&A Regulations 2000* requires the consent authority to form an opinion to determine whether alterations and additions do not significantly increase the environmental impacts of the total development. Where there is no significant increase in the environmental impact the new development is not designated development.

An extract of Clause 35 is provided below:

35 Is there a significant increase in the environmental impacts of the total development?

Development involving alterations or additions to development (whether existing or approved) is not designated development if, in the opinion of the consent authority, the alterations or additions do not significantly increase the environmental impacts of the total development (that is the development together with the additions or alterations) compared with the existing or approved development.

In forming that view, the consent authority is to consider a number of factors as per the following:

- (a) the impact of the existing development having regard to factors including:*
 - (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, and*
 - (ii) rehabilitation or restoration of any disturbed land, and*
 - (iii) the number and nature of all past changes and their cumulative effects, and*
- (b) the likely impact of the proposed alterations or additions having regard to factors including:*
 - (i) the scale, character or nature of the proposal in relation to the development, and*
 - (ii) the existing vegetation, air, noise and water quality, scenic character and special features of the land on which the development is or is to be carried out and the surrounding locality, and*
 - (iii) the degree to which the potential environmental impacts can be predicted with adequate certainty, and*
 - (iv) the capacity of the receiving environment to accommodate changes in environmental impacts, and*
- (c) any proposals:*
 - (i) to mitigate the environmental impacts and manage any residual risk, and*
 - (ii) to facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities.*

The applicant has provided a comparison of the existing, proposed and cumulative impact of the proposed development on air, water and noise (provided in Appendix 4).

In reference to cl.35 (a) the existing factory is required to have a licence from the EPA which has been issued yearly. This provides evidence that the factory is complying with the required codes of practice. There have been no compliance matters raised in relation to noise, air pollution or amenity impacts. An updated Conservation Management Plan has been submitted by the applicant that ensures the protection of the Conservation area.

The applicant has demonstrated that the extended plant will have improved water reuse within the factory process which in turn improves the environmental impacts of the proposed development).

The application is supported by specialist reports which address the potential environmental impacts of the proposed extension (e.g. noise, air quality and stormwater).

The applicant has also provided a legal opinion that confirms that the proposal does not fall under Designated Development (provided in Appendix 7).

Councils Environmental Officer has reviewed the application (refer to Appendix 3) and has formed the following view:

“Overall, it has been demonstrated that the proposed expansion will not significantly increase the environmental impacts of the total development”.

As such it is considered that the proposed alterations and additions are not designated development.

State Environmental Planning Policies (SEPPs)

State Environmental Planning Policy No 71 – Coastal Protection

The Coastal Zone is an area defined on maps issued by the NSW Department of Planning & Environment and the subject property falls within this zone. State Environmental Planning Policy No 71 - Coastal Protection (SEPP 71) aims:

- (a) to protect and manage the natural, cultural, recreational and economic attributes of the New South Wales coast, and*
- (b) to protect and improve existing public access to and along coastal foreshores to the extent that this is compatible with the natural attributes of the coastal foreshore, and*
- (c) to ensure that new opportunities for public access to and along coastal foreshores are identified and realised to the extent that this is compatible with the natural attributes of the coastal foreshore, and*
- (d) to protect and preserve Aboriginal cultural heritage, and Aboriginal places, values, customs, beliefs and traditional knowledge, and*
- (e) to ensure that the visual amenity of the coast is protected, and*
- (f) to protect and preserve beach environments and beach amenity, and*
- (g) to protect and preserve native coastal vegetation, and*
- (h) to protect and preserve the marine environment of New South Wales, and*
- (i) to protect and preserve rock platforms, and*
- (j) to manage the coastal zone in accordance with the principles of ecologically sustainable development (within the meaning of section 6 (2) of the [Protection of the Environment Administration Act 1991](#)), and*
- (k) to ensure that the type, bulk, scale and size of development is appropriate for the location and protects and improves the natural scenic quality of the surrounding area, and*

(l) to encourage a strategic approach to coastal management.

The proposed development is considered to be consistent with the stated aims as it,

- is not considered to negatively effect the natural, cultural, recreational and economic attributes of the New South Wales coast,
- will not impact on public access to and along coastal foreshores,
- is located within a cleared site and will not impact Aboriginal cultural heritage or values,
- will not impact the visual amenity of the coast, or impact on the beach environment,
- will not impact on coastal vegetation,
- will not impact on the marine environment or rock platforms,
- is not inconsistent with the principles of ecologically sustainable development,
- is of a bulk, scale and size which is appropriate for the industrial park location,
- will not impact on coastal management approaches.

SEPP 71 requires the consent authority to the matters for consideration listed in Clause 8 of the SEPP 71 when determining an application within the Coastal Zone.

The matters for consideration are the following:

- (a) the aims of this Policy set out in clause 2,
- (b) existing public access to and along the coastal foreshore for pedestrians or persons with a disability should be retained and, where possible, public access to and along the coastal foreshore for pedestrians or persons with a disability should be improved,
- (c) opportunities to provide new public access to and along the coastal foreshore for pedestrians or persons with a disability,
- (d) the suitability of development given its type, location and design and its relationship with the surrounding area,
- (e) any detrimental impact that development may have on the amenity of the coastal foreshore, including any significant overshadowing of the coastal foreshore and any significant loss of views from a public place to the coastal foreshore,
- (f) the scenic qualities of the New South Wales coast, and means to protect and improve these qualities,
- (g) measures to conserve animals (within the meaning of the *Threatened Species Conservation Act 1995*) and plants (within the meaning of that Act), and their habitats,
- (h) measures to conserve fish (within the meaning of Part 7A of the *Fisheries Management Act 1994*) and marine vegetation (within the meaning of that Part), and their habitats
- (i) existing wildlife corridors and the impact of development on these corridors,
- (j) the likely impact of coastal processes and coastal hazards on development and any likely impacts of development on coastal processes and coastal hazards,
- (k) measures to reduce the potential for conflict between land-based and water-based coastal activities,
- (l) measures to protect the cultural places, values, customs, beliefs and traditional knowledge of Aboriginals,
- (m) likely impacts of development on the water quality of coastal waterbodies,
- (n) the conservation and preservation of items of heritage, archaeological or historic significance,
- (o) only in cases in which a council prepares a draft local environmental plan that applies to land to which this Policy applies, the means to encourage compact towns and cities,
- (p) only in cases in which a development application in relation to proposed development is determined:
 - (i) the cumulative impacts of the proposed development on the environment, and
 - (ii) measures to ensure that water and energy usage by the proposed development is efficient.

The proposed development is considered to be consistent with the matters for consideration as it,

- is consistent with the aims of the policy,
- will not impact on public access to and along coastal foreshores,
- is suitable for the industrial park location,
- will not impact the amenity of the coast, or impact on the beach environment, and will not impact on views or overshadowing of the foreshore,

- will not impact the scenic qualities of the coast,
- is considered acceptable and in accordance with the Threatened Species Conservation Act, Fisheries Management Act and being on a cleared site will not impact on wildlife corridors,
- the development will not impact on coastal processes or hazards, and will not affect land based and water based coastal activities,
- is located within a cleared site and will not impact Aboriginal cultural heritage or values,
- will not impact on the water quality of coastal waterbodies,
- will not impact on heritage conservation values,
- in relation to cumulative impacts on the environment, the proposed facility is on land cleared under a previous consent, and which retains a portion of the site for conservation purposes. The environmental impacts of the development are discussed further within this report however are considered acceptable,
- In relation to water and energy usage, the proponent has demonstrated in the documentation that the proposed plant utilises advanced processes which reduce the use of water within the plant. The industrial facility will be connected to mains electricity.

State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure) aims to facilitate the effective delivery of infrastructure across the State by:

- improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and*
- providing greater flexibility in the location of infrastructure and service facilities, and*
- allowing for the efficient development, redevelopment or disposal of surplus government owned land, and*
- identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and*
- identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and*
- providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.*

The SEPP Infrastructure requires that certain industrial development is to be referred to the Road and Maritime Services (RMS). This includes:

- Industrial development over 20,000m², or with 50 proposed car spaces with access to any road, and
- industrial development over 5,000m² with access to a classified road or a road that connects to classified road (if access is within 90m² of the connection).

The Proposal is for an extension to an existing facility off Wisemans Ferry Road. The proposal was referred to the RMS for comment and no issues were raised from the RMS.

State Environment Planning Policy 19 – Urban Bushland

The site adjoins lands zoned for public recreation and as such the provisions of State Environment Planning Policy 19 – Urban Bushland (SEPP 19) apply.

The general aims of SEPP 19 are:

- its value to the community as part of the natural heritage,*
- its aesthetic value, and*
- its value as a recreational, educational and scientific resource.*

The vegetation on the adjoining site is mapped as E26 Exposed Hawkesbury Woodland and E54 Sandstone Hanging Swamps (Coastal Upland Swamps endangered ecological community).

In consideration of the information provided, the proposal is not considered likely to have a significant impact upon the value of the adjoining reserve and its vegetation. The development is considered to provide for economic use of the land in accordance with the zoning and the existing development within the Somersby locality. Consequently, the proposal is considered to comply with the aims, objectives and Clause 9 of this Policy.

State Environment Planning Policy 33 – Hazardous and Offensive Development

The applicant has provided a Preliminary Hazard Analysis under State Environment Planning Policy 33 – Hazardous and Offensive Development (SEPP 33). SEPP 33 aims to:

- (a) to amend the definitions of hazardous and offensive industries where used in environmental planning instruments, and*
- (b) to render ineffective a provision of any environmental planning instrument that prohibits development for the purpose of a storage facility on the ground that the facility is hazardous or offensive if it is not a hazardous or offensive storage establishment as defined in this Policy, and*
- (c) to require development consent for hazardous or offensive development proposed to be carried out in the Western Division, and*
- (d) to ensure that in determining whether a development is a hazardous or offensive industry, any measures proposed to be employed to reduce the impact of the development are taken into account, and*
- (e) to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact, and*
- (f) to require the advertising of applications to carry out any such development.*

The Preliminary Hazard Analysis states that the current facility exceeds the SEPP33 thresholds for the storage of lime. The lime is managed through:

- CSR Hebel's on site management plan, which includes a pollution incident response plan (if required);
- Environmental Protection Licence which is monitored by the EPA;
- In the event that WorkCover NSW are required to be notified, WorkCover will also ensure appropriate management.
- CSR's work health and safety system also provides management and preventative measures (eg site inductions) to ensure the lime poses a low risk.

The Preliminary Hazard Analysis states that the proposed expansion complies with the Environment Protection Authority and Work Health and Safety legislation. Council's Environmental Officer has recommended additional conditions of consent including:

- The regular maintenance and inspection of the storage area to ensure no mixing of products can occur;
- Clear and appropriate signage is maintained on site;
- Maintenance of emergency response procedures and staff training including site inductions;
- Maintenance on site of Safety Data Sheets.

Sydney Regional Environmental Plan 20 – Hawkesbury Nepean

The site is subject to Sydney Regional Environmental Plan 20 – Hawkesbury Nepean (SREP 20). The aim of the SREP 20 is:

- *to protect the environment of the Hawkesbury-Nepean River system by ensuring that the impacts of future land uses are considered in a regional context.*

The proposal is for the extension of an existing factory on an approved hardstand area. Information has been provided to demonstrate that the proposal will improve the current stormwater run-off due to an improved reuse, filtration and detention system.

In consideration of the additional information provided, the proposal is considered to be consistent with the aims and objectives of this Policy.

Central Coast Regional Plan 2036

The NSW Department of Planning and Environment released the Central Coast Regional Plan 2036 (CCRP) on 14 October 2016. The CCRP sets out the vision for the Central Coast over the next 20 years and identifies economic, social and environmental opportunities to build a more prosperous region and actions to guide development and land use.

The proposal has been assessed against the relevant goals and actions of the CCRP in the following table:

Goal/ Action No.	Goal/Action	Assessment
Goal	A prosperous Central Coast with more jobs close to home	The proposal will provide local employment in the form of an additional 24 staff in the extended factory. During construction additional jobs will also be created. The proposal is therefore consistent with the stated goal and Direction 2.
Direction 2	Focus economic development in the Southern and Northern Growth Corridor	
Action 2.6	Protect environmental values along the Southern Growth Corridor	The Somersby Mintbush has been found on this site. There is an existing conservation area that is subject to a management plan for the site. The management plan has been updated to ensure that the environmental values of the conservation area are maintained. The proposal is therefore consistent with Action 2.6.
Action 3.3	Establish the Northern and Southern Growth Corridors as key locations for economic development, residential growth and investment in health, education, research, knowledge –based industries, professional services, sport and leisure, agribusiness, food manufacturing, high-tech manufacturing and clean technologies.	The proposal is for a large expansion of the existing facility which will ensure the continued growth of the Southern Growth corridor. The proposal is therefore consistent with Action 3.3.
Action 5.2	Locate large-scale industrial uses, freight, manufacturing and logistics businesses near freight routes and the M1 Pacific Motorway interchanges at Somersby, Tuggerah and Warnervale	The proposal is for the production of large hebel blocks. The site is located within an industrial area and is close to the M1 Pacific Motorway. The proposal is therefore consistent with 5.2.

Principal Development Standards

There is no maximum height or floor space ratio development standards under GLEP 2014 for development within the IN1 General Industrial zone.

Zone IN1 General Industrial

The objectives for the IN1 General Industrial are:

- *To provide a wide range of industrial and warehouse land uses;*
- *To encourage employment opportunities;*
- *To minimise any adverse effect of industry on other land uses;*
- *To support and protect industrial land for industrial uses;*
- *To promote ecologically, socially and economically sustainable development;*
- *To ensure that retail, commercial or service and uses in industrial areas are of an ancillary nature; and*
- *To ensure that the development is compatible with the desired future character of the zone.*

The proposal is for a production plant building, including facilities for cutting, storage of raw materials, a hard stand to store materials and a vehicle loading and parking area.

The development is defined as 'general industry' which is permissible in the IN1 General Industrial Zone. The proposed development meets the objectives of the zone as it will provide additional floorspace and storage space for the continued use of the site as a production plant. It also provides for expansion of an existing industry, providing additional employment opportunities and supporting the economic viability of the business.

The proposed development considers and retains the identified conservation area which protects the Somersby Mintbush. The development is considered to meet the principles of the ecologically sustainable development, as specified within the Local Government Act 1993.

5.5 Development within the coastal zone

The provisions of Clause 5.5 of GLEP 2014 require Council to consider matters in relation to the Coastal Zone. The Coastal Zone is an area defined on maps issued by the NSW Department of Planning & Environment and the subject property falls within this zone.

The development will not impact on foreshore access, coastal processes or hazards, and will not impact on the scenic quality, water quality of coastal waterbodies. The proposed facility is on land cleared under a previous consent, and retains a portion of the site for conservation purposes. The proponent has demonstrated that the proposed plant utilises advanced processes which reduce the use of water within the plant and conditions regarding onsite water management are proposed.

The relevant matters have been considered in the assessment of this application and are considered consistent with the stated objectives of the clause.

7.1 Acid sulfate soils

This land has been identified as being affected by the Acid Sulfate Soils Map (level 5) and the matters contained in Clause 7.1 of GLEP 2014 have been considered.

7.2 Flood planning

The land is not mapped as being in a flood prone area. The development is considered satisfactory in respect to Clause 7.2 of GLEP 2014.

7.3 Bushfire

The subject site is located within bushfire prone land on the Gosford City LGA Bushfire Prone Land Map. The site contains vegetation identified as Vegetation Category 1 and the land on the site directly adjoining this vegetation is classified as 'Vegetation Buffer'. A bushfire assessment report was prepared by Newcastle Bushfire Consulting.

The proposal is a Class 8 building under the BCA. The BCA does not provide any bushfire specific performance requirements and as such AS 3959 does not apply as a set of deemed to satisfy requirements. The general fire safety construction provisions are taken as acceptable solutions, however the aim and objectives of PBP 2006 apply in relation to other matters such as access, water and services, emergency planning and landscaping/vegetation management.

The bushfire assessment report considers the asset protection zones, landscaping, vegetation management, water supplies and services, and access including an emergency evacuation plan. The Bushfire Report states that the asset protection zones can be maintained without encroaching upon the conservation area located the south-western corner of the site and along the southern boundary.

The report addresses the aims and objectives of Planning for Bushfire Protection and includes recommendations will be conditioned appropriately.

Gosford Development Control Plan 2013

Chapter 2.1 Character

Section 2.1.4 of the GDCP 2013 sets out the matters which must be considered by Council in the assessment of an application, in relation to character:

Matter for Consideration	Assessment
(a)(i) Merit provisions in Section 79c of the Environmental Planning and Assessment Act 1979,	The application has been assessed against the merit provisions of Section 79C of the EP&A Act. The development provides for the expansion of an existing industrial facility on cleared land within an industrial zone. The proposal provides for the economic use of land, and the protection of land with environmental values. The impacts of the facility are considered reasonable and/or are able to be addressed via proposed consent conditions. The merits of the application are such that the application is recommended for approval.
(a)(ii) Bushfire protection provisions of the Rural Fires and Environmental Assessment Legislation Amendment Act 2002	The subject site is contains some bush fire prone land, therefore the bushfire protection provisions of the Rural Fires Act 1997 and Environmental Assessment Legislation Amendment Act 2002 do apply. A bushfire assessment report has been provided which adequately considers asset protection zones, landscaping, vegetation management, water supplies and services, and access including an emergency evacuation plan.
(a)(iii) Provisions of all applicable State, regional and local environmental planning instruments	The assessment outlined above outlines consideration of the relevant provisions of the State, regional and local environmental planning instruments.
(a)(iv) Matters for consideration that are specified by this Plan	All matters for considered specified by the GDCP 2013 have been considered and are set out in full within this assessment report.
(a)(v) Any adopted policies or strategies that might be applicable	The development is considered to be consistent with the Central Coast Regional Plan 2036. The proposal is assessed against the draft Somersby Management Plan and the development is considered to be in accordance with the Somersby Management Plan as the development is an extension to an existing industrial use, there is no aboriginal sites known on the site and additional landscaping including the conservation area is provided.

Matter for Consideration	Assessment
(c)(i) Consider: Preferred land use + development density: conformity with the preferred use and compatibility with the amenity typically associated with that use	The whole of the site is zoned IN1 General Industrial which permits the proposed development. The assessment concludes that the proposal is acceptable after extensive environmental studies related to air, noise and water impacts. The proposal will improve the performance of the existing factory and the new technology in the proposed extension will not result in any additional substantial environmental impacts. The proposed development is consistent with the intended industrial development within the locality.
(c)(ii) Consider: Scenic prominence + distinctiveness: protection and enhancement	The proposal is located in the appropriate industrial zone. It is not considered to be out of scale, and the design is consistent with that of contemporary industrial buildings. Substantial glazing is proposed on the street frontage which is considered to provide an attractive street address.
(c)(iii) Consider: Existing natural features: conservation and enhancement	The improved technology will result in improved water recycling and stormwater on the site. The conservation area on the site is retained and protected through this proposal.
(c)(iv) Consider: Siting of buildings + surrounding gardens: consistency with predominant patterns across the surrounding neighbourhood	The proposal is located in an industrial estate and is an appropriate design. The street setback is landscaped with a range of trees, shrubs and ground covers. The landscaping helps to soften and conceal the parking area provided within the front setback area. The design of the development is considered appropriate for the locality and incorporates a mix of materials and positive design elements.
(c)(v) Consider: Height, size + scale of buildings: compatibility with predominant patterns across the surrounding neighbourhood	The locality has no established maximum height limit. The adjoining developments are single storey industrial buildings. The proposal has an appropriate height and scale in the context of the locality.
(c)(vi) Consider: Architectural form, construction + detail: appropriateness to existing scenic quality and streetscape character	The design of the development is considered appropriate for the locality and incorporates a mix of materials and positive design elements. The street setback is landscaped with a range of trees, shrubs and ground covers which help to soften the appearance of the building.
(c)(vii) Consider: Garden design, including outdoor structures: compatibility with scenic quality and streetscape character	The landscape plan provided is considered appropriate for the industrial locality. The street setback is landscaped with a range of trees, shrubs and ground covers which help to soften the appearance of the building.
(c)(viii) Consider: Street verges: conservation of visually-prominent landscape features plus effective integration with urban services.	The design retains the conservation area in the western portion of the site. The site does not comprise any visually-prominent landscape feature which warrants conservation/integration.
(d)(i) Demonstrate consistency or compatibility with Character Statement	The Somersby 2: Employment Estate – refer to discussed in the following section.
(d)(ii) Demonstrate consistency or compatibility with character of site and its surrounds	

Somersby 2: Employment Estate of Gosford

The site is located within the 'character place' of Somersby 2: Employment Estate of GDCP 2013. The desired character objectives area as follows:

This area will remain a master-planned estate for medium – and higher – impact employment activities, where development conserves the scenic value of surrounding bushland backdrops, protects Aboriginal cultural values, maintains the amenity of nearby residential properties, and achieves high standards of streetscape quality.

Future development will conform to detailed planning controls that have been prepared and adopted for this area.

The proposal is consistent with the relevant planning controls and has been designed to be of a height, bulk and scale compatible with the existing development in the Somersby Industrial Estate. The proposal will be connected to the existing CSR Hebel building. A conservation area has previously been created to protect the Somersby Mintbush (*Prostanthera junonis*) which has been found on the site.

The proposal is consistent with the desired character for the area and therefore achieves the objectives of Chapter 2.1.

Chapter 2.2 - Scenic Quality

The proposal is subject to the provisions of GDCP 2013 Chapter 2.2 – Scenic Quality and is located within the Plateau Geographic Unit and encompasses the Landscape Unit of Somersby Plateau.

The principle aim of the Scenic Quality Development Control Plan is to provide guidelines for the interpretation and management of the Scenic Quality of Gosford and provides for the following objectives:

1. Recognise importance of Brisbane Water Escarpment with its visual integrity and *naturalness being valuable assets which need to be protected from development involving rezonings which increase densities and/or increase the range of uses permissible.*
2. *Support application of Somersby Landscape Guidelines for development in Somersby Industrial Park.*
3. *Recognise importance to the 'impressions of Gosford' for travellers on the Freeway and entering Gosford on the Central Coast Highway created by development viewed from these roads.*
4. *Particular attention be paid to visual screening in the determination of development applications for extractive industries.*
5. *Recognise importance of wind row tree planting, natural forest verges and remnant native forest stands to the landscape character of the agricultural areas and retain wherever possible particularly when viewed from major roads in area.*
6. *Resist rezonings for 'urban support' activities which are out of keeping with rural landscape character of agricultural areas.*
7. *Recognise importance of privately owned Environmental Conservation/7(a) zoned land in providing a complimentary land system to and a buffer for National Parks.*

The proposal is for an industrial building within an identified industrial estate. Plantings and landscaping are proposed along the frontage, which provides visual screening and softening of the street appearance. The required conservation area (under Court Consent) also provides a natural landscaped element along the main road. The proposal has been assessed and found to be consistent with the relevant stated objectives of GDCP 2013 Chapter 2.2 - Scenic Quality.

Chapter 3.11 – Industrial Development

Clause	Required	Proposed	Compliance
3.11.5.2 – Setback from boundaries	Front setback from main and arterial roads - 20m	The proposed extension is located 30m from Wisemans Ferry Road.	Yes
	Side Setback - Lots greater than 4000m ² – 5m	The building is setback more than 5m from all other boundaries.	
	Rear Setback - Lots greater than 4000m ² – 5m		
3.11.5.3 – Building Height	Overshadowing of adjoining properties to be minimised, special attention to employee amenity or recreation areas.	The building will be 12m in height which is consistent with the height of the existing adjoining buildings. There is no impact on employee amenity or recreation areas.	Yes
	Building should not project above the skyline and detract from the natural landscape when viewed from a distance	The design is not considered to detract from the natural landscape when viewed from a distance.	

3.11.5.4 – Building Appearance	The facade and minimum 4 metre return of any building facing the frontage to, or readily visible from any road, shall be constructed of brick, masonry, glass (reflectivity <20%), precast panels, or similar durable materials of appropriate texture, colour and finish.	The proposed building design incorporates modern built elements, and roof forms which are appropriate for the scale of the development and the locality. The design incorporates a variety of materials including a wall of glazing to the administration and staff areas that faces the main road. This is considered to provide an attractive street address.	Yes
3.11.7.3 - Loading and Unloading	<p>Provision for on-site loading and unloading of vehicles, with adequate manoeuvring space exclusive of car parking requirement - vehicles to enter and exit in a forward direction.</p> <p>Loading docks or vehicular entries shall not be provided on any street elevation. Where such facilities can only be provided to street frontages, they must be screened with landscaping.</p> <p>Loading/unloading and associated manoeuvring areas are to be exclusive of the relevant car parking requirement.</p> <p>Loading docks may be internal or external with min loading area/dock of 3.5m width x 8m length x 3.6m height clearance.</p>	<p>The new access arrangements separate the light and heavy vehicle movements.</p> <p>All loading will continue to be completely within the site and at the rear.</p> <p>There is adequate space and arrangements to allow both heavy and light vehicles to enter and exit in a forward direction.</p> <p>Loading docks have an 8m wide x 5m high at grade roller shutter door which exceeds the requirements.</p>	Yes
3.11.8.3 - Landscaping	All set back and car parking areas are to be landscaped and maintained in accordance with sound landscaping principles.	<p>The existing landscaped areas are to be retained along the boundaries.</p> <p>The existing and proposed car parking spaces are located behind landscaped areas.</p>	Yes

Chapter 7.1 Car Parking

The carparking rates set under the GDCP 2013 and RMS guide to traffic generating development are substantially different in relation to this development. As per the tables below, the GDCP 2013 requires a total of 222 spaces and the RMS guide to traffic generating development requires a total of 24 car spaces.

The proposed use is partly an industrial factory building, administration and a storage yard. Therefore the following parking rates apply:

GDCP 2013 Car parking requirement	Floorspace	Car parking spaces required
1 space per 100m ² of industrial floor space	Proposed - 9,404 m ² Existing - 7,716 m ² Total 17,120 m ²	171
1 space per 300m ² for warehouse/bulk stores/self-storage units	Proposed – 353 Existing -993 Total – 1,346	4
1 space per 40m ² for ancillary office space.	Proposed - 256 Existing - 1610 Total – 1,866	47
Total required		222

Car parking requirement under RMS guide to traffic generating	Floorspace	Car parking spaces required
Wholesale, Industrial (all spaces adequate for trucks) 10 + 1 space per 1000m ² for sites over 8000 m ²	Proposed - 9,404 m ² Existing - 7,716 m ² Total 17,120 m ²	19
Other uses 2000m ² for warehouse/bulk stores/self-storage units	Proposed – 353 Existing -993 Total – 1,346	4
Commercial premises 1 space per 4000m ² for ancillary office space.	Proposed - 256 Existing - 1610 Total – 1,866	1
Total		24

The numerical requirements of the GDCP 2013 does not take into account the automated nature of the factory which, although it has a very large floorplate does not require many staff to run the machinery.

The application states that the 24 hour per day operational needs of facility mean that parking rates fluctuate due to shift work schedules. This means that during normal operations, the site will accommodate 40 factory staff per shift plus 40 administration staff during the day. It is noted that at the end of one shift and start of the next shift, there will be a peak demand to park 80 factory staff plus the 40 administration staff (120 staff).

Currently there is 72 car parking spaces on the site. The proposed new car park will provide an additional 50 spaces. In total the development will provide a combined total of 122 car spaces which meets the operational requirements of the development.

Requiring an additional 100 spaces (as per GDCP 2013) would result in a large unused carpark which is not considered necessary and would result in additional unnecessary impacts. As such the proposed 122 car spaces is considered acceptable and appropriate.

Noise Assessment

Wilkinson Murray was engaged by the applicant to assess the potential noise impacts associated with the proposal. The specialist states that the assessment was undertaken in accordance with the relevant NSW State Government policies and guidelines.

Noise sources include truck movements, delivery of materials, forklifts, front end loaders, light vehicle movements and panel cutting. Worse case noise levels were predicted for both the existing and proposed operations. It is acknowledged that background noise levels on the site are influenced by the M1 Motorway traffic.

Noise generated from the existing site operations is expected to be inaudible at all identified receivers. The noise for the proposed expansion is expected to be slightly audible however not intrusive. It was concluded that the noise associated with the existing and proposed development is predicted to comply with the day, evening and night time noise criteria and is unlikely to result in significant noise impacts at the identified receivers.

This information has been accepted in good faith. A condition of consent has been recommended to comply with NSW Industrial Noise Policy.

Air Quality Assessment

Todoroski Air Sciences were appointed to assess the potential air quality noise impacts associated with the proposal. The specialist states that the assessment was undertaken in accordance with the NSW Environmental Protection Authority's Approved Methods for Modelling and Assessment of Air Pollutants in NSW and The Ambient Air Quality National Environment Protection Measure.

Air impacts include dust particulates from handling raw materials, vehicle movements and windblown generated dust. Air impacts also include nitrogen dioxide from the boiler and the autoclave exhaust stacks.

Worse case air quality levels were predicted for both the existing and proposed operations. The predicted cumulative particulate matter, total suspended particulates and dust deposition levels would increase slightly at the sensitive receiver locations due to the proposed extension. The results indicate that the predicted levels, cumulative concentrations and NO₂ concentrations will be below the relevant criteria at the sensitive receptor locations. The proposal would not lead to an unacceptable level of environmental harm or impact with respect to air quality.

The Air Quality Assessment recommended operational and physical mitigations measures to manage dust impacts. These recommendations have been included as conditions of consent.

Surface Water Management

ACOR Consultants have provided a revised civil engineering design for the proposed extension which gives consideration to the entire development site (lot 1 and lot 22).

Stormwater runoff from the development and hardstand areas will be directed to a stormwater reuse/detention basin located in the north eastern corner of the development site. Approximately 75kL/day of water from this tank will be reused in the manufacturing processes in order to reduce water consumption from the local water supply. This equates to a cost saving of approximately \$60,000 p.a. Increasing stormwater reuse volumes results in a reduction in the total site pollutants. Stormwater modelling has estimated that total site pollution reduction exceeds Council's requirements for total suspended solids, total phosphorus and total nitrogen.

Ecology

The site contains a Land and Environment Court approved development footprint and conservation area which reflected the provisions of the Somersby Industrial Estate Plan of management. The development footprint preserves the conservation area as identified in the Land and Environment Court Order applies (LEC10454/2009). The Land and Environment Court Order required the conservation area to be managed in perpetuity by the landowner through the implementation of the CAMP. The conservation area has been placed under a public positive covenant in accordance with the Order.

Council's Environmental Officer undertook a site inspection on the 3/6/2016 and confirmed that there is a degraded habitat over the western and central portion of the site that was dominated by the highly invasive *Pinus radiata*. Visual inspection confirmed that the infestation of pine trees has increased over the southern and eastern portions of the site when compared with the site inspection undertaken during the LEC case in 2008/9. *Radiata* pines have recently been removed from within the development footprint in accordance with the Conservation Areas Management Plan.

Conservation Area Management Plan

A Conservation Area Management Plan (CAMP) was prepared by Whelan Insites in 2009 for the conservation zones located along the southern property boundary. The aim of the CAMP was to:

- Provide the detailed basis for the removal and ongoing control of weeds within the conservation areas;
- To provide the basis for implementation of a bush regeneration and rehabilitation program designed to remove weeds and to optimise conditions for the threatened flora species Somersby Mintbush and Spreading guinea-flower;
- To monitor any impacts of the development and to provide measures to address any such impacts; and
- To enhance and consolidate the condition of the native vegetation within the conservation area for biodiversity conservation purposes.

A letter of compliance from Kleinfelder dated 4 November 2016 was submitted to support the application. The letter concludes that CSR Hebel complies with the actions outlines in the CAMP.

The CAMP is subject to a review every five years. A part of this development application, Kleinfelder was engaged to undertake the review to ensure the goals of enhancing habitat and to incorporate new information and / or management regimes. It is proposed to supersede the CAMP with a revised version prepared by Kleinfelder (2016).

Targeted weed species will be managed by a bushland regenerator twice in the first year and once every year thereafter. Temporary construction fencing will be installed along with permanent fencing along the northern boundary of the conservation area and adjacent to the riparian corridor. Stormwater will be directed to a large detention basin for reuse in the production process. If observed, pests will be managed. An ecological burn is scheduled for 2018 in consultation with Council, NSW Office of Environment and Heritage and the Rural Fire Service.

The revised CAMP has been reviewed and forms part of this environmental assessment. Council's Environment Officer raised no objection subject to implementation of the recommended conditions of consent.

Environmental Protection Licence

An Environmental Protection Licence exists for operations activities of the existing facility (#3427) in accordance with Schedule 1 of the *Protection of Environment Operations Act 1997*. These scheduled activities include 50,000m³ of concrete works and >30,000-100,000 tonnes of crushing, grinding or separating works. The Environment Protection Authority (EPA) classifies the CSR Hebel facility as a Level 1 low environmental risk under their licensing system.

A telephone conversation with EPA's Operations Officer, Alex Beavis was undertaken on the 30 August 2016. In their recent site inspection the EPA identified a number of issues requiring improvement including:

- Stormwater management
- pH of stormwater
- Importing materials
- Migration of white dust offsite
- Makeshift stockpiles of sand and lime
- Issues with aluminium processing and handling

- Noise issues from pumps and loading
- External storage of products wrapped in plastic
- Sediment entering stormwater drains

These matters have been considered in the assessment of the development application. A condition of consent has been recommended for a licence variation with the EPA for an increase to productivity quantities and to include the subject site into the existing licence.

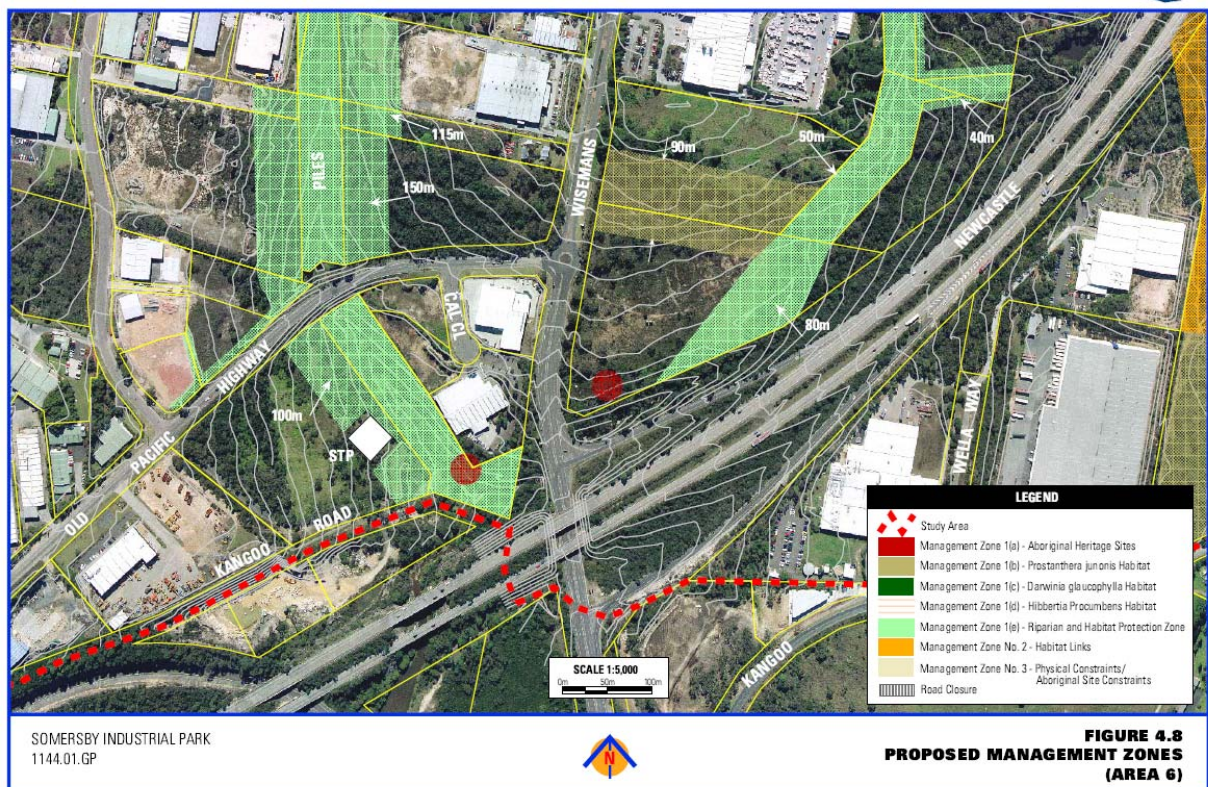
Draft Plan of Management for Somersby Industrial Park (PMSIP)

The draft Plan of Management for Somersby Industrial Park (PMSIP) identifies performance objectives and management actions for environmental, Aboriginal heritage and economic values.

The proposed extension of the facility will provide additional employment therefore meeting objective (a). The draft Plan of Management shows that the subject site contains *Prostanthera junonis* habitat (shown in green on the following plan). A conservation area will be maintained which will ensure that the *Prostanthera junonis* (Somersby Mintbush) will be protected.

The draft Plan of Management identifies areas which are affected by Aboriginal Heritage (shown with red dots on the following plan). The subject site is not identified as an area of Aboriginal Heritage.

Additionally a search of the OEH's AHIMS Web Services has shown that no Aboriginal sites have been recorded or Aboriginal places declared in or near the subject site.



Assumed Concurrence – Somersby Industrial Park Plan of Management

The Somersby Industrial Park Plan of Management applies to the land and seeks to provide a holistic approach to conserving the environmental and indigenous heritage of the Industrial

Park. The plan seeks to provide for appropriate development whilst ensure the protection of threatened species which was found on this site.

The application was referred to the NSW Office of Environment & Heritage (OEH), who noted that the proposal will not impact upon the remaining conservation areas as per the Court approval.

Given the proposed development will not result in additional impacts to the recorded threatened species or their habitat (other than those already approved), OEH advised that concurrence is not required.

OEH encourages CSR Hebel to commit to the active management of the conservation areas (e.g. removal of pine trees and ongoing control on the site). These recommendations have been addressed as conditions of consent.

Lot consolidation

A condition has been recommended to ensure that the two Lots are consolidated into a single allotment under one Certificate of Title, as the proposed extension extends over both lots.

Development Contribution Plan

The land is zoned IN1 General Industrial is therefore not subject to a Section 94 contribution plan

Referrals

Internal Referral Body	Comments
Engineering	Supported, subject to conditions
Environment	Supported, subject to conditions
Trade Waste	Supported, subject to conditions
Tree Officer	Supported, subject to conditions

External Referral Body	Comments
RMS	Supported, subject to conditions
Department of Environment and Conservation	Assumed concurrence has been provided
Office of Environment and Heritage	Concurrence was not required

Political Donations

No political donations were declared by the applicant, applicant's consultant or owner.

Public Submissions

The proposed development was advertised on 10 January until 25 January 2017. One submission was received from Ausgrid related to the location and access to a substation.

The applicant met with Ausgrid representatives to resolve the issues raised in the submission. An amended plan has been provided to provide for a realignment of a portion of

the existing Right of Way and relocation of the retaining wall outside of the cable easement. As such Ausgrid withdrew the original objection to the proposal.

Conclusion

The application seeks approval for the construction of an extension to an existing Hebel production plant, storage area, office area, loading bays and landscaping. The Somersby Mintbush has been found on the site and a previous Land and Environment Court approval has required a conservation area to be established on site which will be maintained through the proposed development.

This application has been assessed under the heads of consideration of section 79C of the *Environmental Planning and Assessment Act 1979* and all relevant instruments and policies. The potential constraints of the site have been assessed and it is considered that the site is suitable for the proposed development.

Council's Environmental Officer has concluded that the proposal does not significantly increase the environmental impact of the total development. The applicant has undertaken the required studies and provided adequate information to determine that the proposal does not fall under designated development.

Subject to the imposition of appropriate conditions, the proposed development is not expected to have any adverse social or economic impact. It is considered that the proposed development will complement the locality and meet the desired future character of the area.

Accordingly, the application is recommended for approval pursuant to Section 80 of the *Environmental Planning and Assessment Act*.

Plans for Stamping:

Original Lodged Plans. ECM Doc No. 23968804

Supporting Documents for Binding with consent:

Document Name:

Bushfire Report

ECM Doc. No 22633871

Waste Management Plan

ECM Doc. No 22634056

Air Quality Impact Assessment – Todoroski Air Sciences Pty Ltd

ECM Doc. No 23579895

ACOR Consultants - Civil Engineering Report

ECM Doc. No 23579896

Kleinfelder - Conservation Management Plan

ECM Doc.. No 23579897

Operational Noise Assessment – Wilkinson Murray

ECM Doc. No 23579888

Attachments:

Appendix 1: Assumed concurrence from Department of Environment and Conservation – ECM Doc No. 23220980

Appendix 2: Response from Office of Environment and Heritage - ECM Doc No 23598115

Appendix 3: Environmental Comments - ECM Doc No 23657866

Appendix 4: Outstanding information Report – ECM Doc. No 23579899

Appendix 5: Flow diagram of the process on site - ECM Doc No 23597795

Appendix 6: Court conditions – ECM Doc No 23959734

Appendix 7: CSR Hebel Legal opinion – ECM Doc No 23967287

Proposed Conditions of Consent:

ECM Doc No : 23962120

SITE PLAN

