



Ms Elaine Dickson
Chief Risk Officer

Baiada Properties Pty Ltd
13-15 Amax Avenue
Girraween NSW 2145

9 February 2022

Dear Ms Dickson

**Grenfell Poultry Breeder Farm (SSD-13855453)
Additional Matters for Submissions Report**

I refer to the Department's previous correspondence dated 3 February 2022 which requests the provision of a Submissions Report in response to issues raised in submission by agencies and the public.

In addition to responding to the submissions already received you are required to submit additional information that addresses the issues identified in **Attachment 1**.

If you have any questions, please contact Jeffrey Peng on (02) 9995 6685 or via email at jeffrey.peng@planning.nsw.gov.au.

Yours sincerely,

Chris Ritchie

**Director
Industry Assessments
as delegate for the Planning Secretary**

ATTACHMENT 1

Based upon the Department's review of the information of the EIS, the Department considers further information is required to clarify matters and addresses inconsistencies within the documentation. The Department's comments are detailed as follows.

Water Supply

1. The EIS claims the site has access to adequate and reliable water supply for the anticipated operational demand. However, the EIS also notes further detailed design, in consultation with Central Tablelands Water, is required to confirm the necessary upgrades to the existing infrastructure. It is requested details of all necessary water supply infrastructure be provided in the RTS, including details of the supporting water balance analysis and infrastructure arrangement required to extract, transfer, treat and store water during normal operating and emergency conditions. A contingency plan for supporting and managing water requirements during times of low flow or drought is also required.

Utilities and Services

2. It is understood significant electricity infrastructure upgrades are required to cater for the proposal. It is requested the Applicant provide evidence that appropriate arrangements have been established with relevant authorities for the adequate provision of electricity to the proposal.

Animal Welfare and Biosecurity

3. Several submissions have raised concerns about animal welfare and the potential risk of zoonotic diseases. It is requested the Applicant provide site-specific information to demonstrate how the proposal will comply with relevant codes of practice and guidelines. The RTS should address, as a minimum, the following considerations:
 - a) Stocking density (in terms of weather, shed design and climate control capabilities), equipment, lighting, ventilation, noise, food and water supply, litter quality, inspections, poultry transportation, as well as shed personnel and bird handling requirements in its discussion of animal welfare management, including contingency measures when:
 - site managers are required to be evacuated during floods events
 - feed/water supply is restricted
 - farm workers are unable to attend the site to attend to husbandry operations.
 - b) biosecurity and disease management practices and procedures to be implemented at the proposed development, including the identification of viable treatment and disposal options in the Central West region.

Waste Management

4. The following additional information regarding the generation and management of waste is requested in the RTS:
 - a) A revised waste assessment that clearly identifies, characterises, and categorises operational waste streams (including but not limited to general daily waste, green waste, hazardous waste, poultry litter and dead birds) in accordance with the EPA Waste Classification Guidelines
 - b) Details of intended methods of waste management for each identified waste stream, including any on-site waste treatment and storage option(s), disposal site(s) and a contingency plan for mass mortality events

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- c) Details regarding the proposed wastewater system to treat and dispose of wastewater from the operation of development is required, including its process overview, location, components, land area proposed for irrigation and design drawings.

Odour

5. Concerns have been raised by the public in relation to odour and the following information is requested to confirm the validity of the odour impact assessment:
 - a) Details of modelled variation in total shed odour emission rates over time to demonstrate worst-case emission scenarios have been appropriately considered in the odour impact assessment
 - b) Details of odour impacts likely to be associated with cold air drainage effects on all identified and potentially affected receivers.

Visual Amenity

6. An assessment of the potential visual impacts on the nearest property identified as Lot 2 DP595663 is required, including an evaluation of the effectiveness of the proposed landscape buffer (at different plant maturity conditions) on the magnitude of visual impact.

Noise

7. Concerns have been raised by the public regarding acoustic impacts and the following additional information is requested in the RTS:
 - a) Details of noise monitoring survey and long-term noise monitoring data, which must be provided in the noise and vibration impact assessment (NVIA) in accordance with reporting requirements established in the Australian Standard AS 1055:2018 and the EPA Noise Policy for Industry
 - b) Please provide details of in-house noise emission measurements referred confirm model input assumptions and a clear description of how noise would be generated by the proposed activities
 - c) Maximum noise level assessment of construction and operational vehicle movements along Gooloogong Road at the most-affected residential receiver(s)
 - d) Operational noise contours
 - e) Construction noise predictions which are representative of the worst-case cumulative emission scenarios rather than assuming individual plant would operate in isolation
 - f) Justification for the exclusion of all annoying noise characteristics.

Community Engagement

8. Provide details and outcomes of further engagement with public authorities and the community during or after the exhibition period.

Consideration of Relevant Planning Instruments

9. The EIS has only provided an assessment of the proposed development against the provisions set out in the Weddin Shire Development Control Plan 2014. It is requested additional information be provided to clearly demonstrate how the proposed development has addressed the provisions of the Weddin Shire Local Environmental Plan 2011 for intensive livestock agriculture.

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Hazards and Risk

10. The preliminary risk screening assessment undertaken by the Applicant identified that the storage of Liquid Petroleum Gas (LPG) exceeded the threshold quantities in the guideline on Applying SEPP 33. Given the submitted SEPP 33 assessment is based on a semi-quantitative analysis, it is requested the following comments be addressed in the RTS:
 - a) description of the effects of flashfires, taking into consideration established risk assessment practice
 - b) all credible scenarios that may result in an off-site impact in undertaking a semi-quantitative risk assessment, noting that the release rate of LPG should be based on hole sizes used in established risk assessment practice (e.g., *Failure Rate and Event Data for use within Risk Assessments*, HSE, 2017) and consequence distances evaluated, as a minimum, for the atmospheric stability conditions of F1.5 (representing night conditions)
 - c) a conservative level of 100% should be used in the modelling of all BLEVE events for tanks given that some LPG vessels are grouped such that a knock-on effect may occur with adjacent full LPG vessels
 - d) when evaluating the consequences from a road tanker, consideration should be given to a larger road tanker capacity of LPG (21 tonnes, triple-axle)

The event frequency should be compared to the risk criteria found in HIPAP No.4 if any of the hazardous events are found to affect surrounding land uses.

Construction and Operational Details of the Development

The following information is required in the RTS to clarify construction and operational details of the proposed development:

11. The indicative levels and amount of cut and fill, duration of earthworks and potential for dust impacts.
12. Details of mechanical plant, machinery, and equipment (including technical specification, plant schedule and siting plan).
13. Variability in traffic generation pattern across the anticipated production cycles.