



## Planning & Infrastructure

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Our Ref: 11\_04458

Mr Russell Hand  
BBC Consulting  
PO Box 438  
BROADWAY NSW 2007

Dear Mr Hand

### Director-General's Requirements Primo Smallgoods Production Project (MP 11\_0055)

The Department has received your application for the Primo Smallgoods Production Project.

I have attached a copy of the Director General's requirements for the Project. These requirements have been prepared in consultation with the relevant Government authorities, and are based on the information you have provided to date. I have also attached a copy of the government authorities' comments for your information. Please note that the Director-General may alter these requirements at any time.

If your proposal is likely to have a significant impact on matters of National Environmental Significance, it will require an approval under the Commonwealth *Environment Protection Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. It is your responsibility to contact the Department of Environment, Water, Heritage and the Arts in Canberra (6274 1111 or <http://www.environment.gov.au>) to determine if the proposal requires an approval under the EPBC Act. If it is determined that an approval is required under the EPBC Act, please contact me immediately as supplementary Director-General's requirements may need to be issued.

It would be appreciated if you can contact the Department at least two weeks before you propose to submit your Environmental Assessment for the Project. This will enable the Department to determine the:

- applicable fee (see Division 1A, Part 15 of the Environmental Planning and Assessment Regulation 2000);
- consultation and public exhibition arrangements; and
- number of copies (hard-copy and/or CD-ROM) of the Environmental Assessment that will be required for exhibition purposes.

Once the Department receives the Environmental Assessment, it will review it in consultation with the relevant agencies to determine if it adequately addresses the Director-General's requirements, and may require you to revise it prior to public exhibition.

The Department is required to make all the relevant information associated with the project publicly available on its website. Consequently, it would be appreciated if you can ensure all documents submitted to the Department are in a suitable format for the internet.

If you have any enquiries about these requirements, please contact David Mooney on 9228 2040 or at [david.mooney@planning.nsw.gov.au](mailto:david.mooney@planning.nsw.gov.au).

Yours sincerely,

*SHaddad*

Sam Haddad  
Director-General

14/4/2011

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# Director-General's Requirements

Section 75F of the *Environmental Planning and Assessment Act 1979*

<b>Application Number</b>	MP 11_0055
<b>Project</b>	The Primo Smallgoods Production Project which includes the reconstruction of a smallgoods processing facility at Greenacre. The project includes demolition of some existing structures on site and construction of a new processing facility and associated infrastructure.
<b>Site</b>	The subject site is located at 37-39 Wentworth Street, Greenacre within the Strathfield Council LGA.
<b>Proponent</b>	P&M Quality Smallgoods Pty Ltd.
<b>Date of Issue</b>	April 2011
<b>General Requirements</b>	<p>The Environmental Assessment of the project must include:</p> <ul style="list-style-type: none"><li>• an executive summary;</li><li>• a detailed description of the following within the site and any associated areas:<ul style="list-style-type: none"><li>– historical operations/activities; and</li><li>– existing and approved operation/facilities, including any statutory approvals that apply to these operations and facilities.</li></ul></li><li>• a detailed description of the project, including:<ul style="list-style-type: none"><li>– need for the project;</li><li>– alternatives considered;</li><li>– the development to be carried out on site, including plans of all existing and proposed building works; and</li><li>– likely staging of this development;</li></ul></li><li>• a risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment;</li><li>• a detailed assessment of the key issues specified below, and any other significant issues identified in the risk assessment (see above), which includes:<ul style="list-style-type: none"><li>– a description of the existing environment, using sufficient baseline data;</li><li>– an assessment of the potential impacts of the project, including any cumulative impacts, taking into consideration any relevant guidelines, policies, plans and statutory provisions (see below);</li><li>– a description of the measures that would be implemented to avoid, minimise, and if necessary offset the potential impacts of the project, including detailed contingency plans for managing any significant risks to the environment;</li></ul></li><li>• a suitable assessment of the other issues specified below, outlining the measures that would be implemented to minimise the potential impacts of the project;</li></ul> <ul style="list-style-type: none"><li>• a statement of commitments, outlining all the proposed environmental management and monitoring measures for the project;</li><li>• a conclusion justifying the project on economic, social and environmental grounds, taking into consideration whether the project is consistent with the objects of the <i>Environmental Planning &amp; Assessment Act 1979</i>; and</li><li>• a signed statement from the author of the Environmental Assessment, certifying that the information contained within the document is neither false nor misleading.</li></ul>
<b>Key Issues</b>	<ul style="list-style-type: none"><li>• <b>Air Quality</b> – including a quantitative assessment of the potential air quality impacts during construction and operation of the project (including dust, odour, fugitive and all point source emissions). This assessment shall also consider potential impacts of the proposal on any nearby sensitive receivers;</li></ul>

	<ul style="list-style-type: none"> <li>• <b>Noise and Vibration</b> – including construction, operational and traffic noise and vibration impacts. This assessment shall also consider the potential impacts of the proposal on any nearby sensitive receivers;</li> <li>• <b>Soil and Water</b> – including <ul style="list-style-type: none"> <li>- a detailed assessment of potential soil, surface, flooding and groundwater impacts;</li> <li>- potential soil contamination and any proposed management measures;</li> <li>- details of proposed erosion and sedimentation controls (during construction);</li> <li>- details of proposed stormwater management measures (during construction and operation);</li> <li>- an outline of the proposed water requirements, including sources of water, usage and efficiency measures;</li> <li>- identify and detail measures to manage potential acid sulphate soils; and</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>- wastewater management, spill containment and bunding.</li> <li>• <b>Traffic</b> – including: <ul style="list-style-type: none"> <li>- details of the existing traffic types and volumes;</li> <li>- details of all traffic types and volumes likely to be generated during construction and operation (including daily &amp; peak movements);</li> <li>- details of proposed access and parking arrangements; and</li> <li>- an assessment of the predicted impacts of construction and operational traffic on road safety and the capacity of the road network, particularly the intersection of Roberts Road and Norfolk Road.</li> </ul> </li> <li>• <b>Greenhouse Gas &amp; Energy Efficiency</b> – including: <ul style="list-style-type: none"> <li>- a qualitative assessment of the potential greenhouse gas emissions of the project, and qualitative assessment of the potential impacts of these emissions on the environment; and</li> <li>- a detailed description of the measures that would be implemented on site to ensure that the project is energy efficient.</li> </ul> </li> <li>• <b>Waste</b> – including <ul style="list-style-type: none"> <li>- accurate estimates of the quantity and classification of all potential sources of liquid and non-liquid waste to be utilised and/or generated by the project and how this waste would be handled, stored, processed and, if necessary, disposed of; and</li> <li>- details of any hazardous waste and how this would be managed.</li> </ul> </li> <li>• <b>Hazards and Risk</b> – including an assessment of the potential hazards and risks associated with the proposed project and risks to adjacent industries. A preliminary risk screening must be completed in accordance with <i>State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33)</i> and <i>Applying SEPP 33 (DoP, 2011)</i>, and where necessary, a Preliminary Hazard Analysis (PHA) undertaken.</li> </ul>
<b>References</b>	<p>The EA should take into account relevant Government technical and policy guidelines, as well as industry guidelines and relevant strategic plans. While not exhaustive, guidelines and plans which may be relevant to the Project are included in the attached lists.</p>
<b>Consultation</b>	<p>During the preparation of the EA, you should consult with the relevant local, State or Commonwealth government authorities, service providers, community groups or affected landowners.</p> <p>In particular, you must consult with:</p> <ul style="list-style-type: none"> <li>• Office of Environment and Heritage;</li> <li>• Office of the NSW Food Authority;</li> <li>• Department of Primary Industries;</li> <li>• Roads and Traffic Authority; and</li> <li>• Strathfield Council.</li> </ul> <p>The EA must clearly indicate issues raised by stakeholders during consultation, and how those matters have been addressed in the EA.</p>
<b>Deemed refusal period</b>	60 days.

## Policies, Guidelines & Plans

### Air Quality

Protection of the Environment Operations (Clean Air) Regulation 2002  
Approved Methods for the Modelling & Assessment of Air Pollutants in NSW (DEC)  
Approved Methods for the Sampling & Analysis of Air Pollutants in NSW (DEC)

### Noise & Vibration

NSW Industrial Noise Policy (DECC)  
Environmental Noise Control Manual (DECC)  
Environmental Noise Management – Assessing Vibration: a technical guide (DEC)  
NSW Road Noise Policy (DECCW 2011)  
Interim Construction Noise Guideline (DECC)  
DIN 4150 Part 3 - Structural Vibration: effects of vibration on structures (ISO, 1999)

### Soil & Water

*Surface Water*  
National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ)  
National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ)  
Using the ANZECC Guideline and Water Quality Objectives in NSW (DEC)  
State Water Management Outcomes Plan  
Managing Urban Stormwater: Soils & Construction (Landcom)  
Draft Coastal Risk Management Guide: Incorporating sea level rise benchmarks in flood risk assessments (DECC)  
NSW Coastal Planning Guideline: Adapting to sea level rise (DoP, 2010)  
Floodplain Development Manual (DIPNR)  
Floodplain Risk Management Guideline (DECC)

*Groundwater*  
National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)  
NSW State Groundwater Policy Framework Document (DLWC, 1997)  
NSW State Groundwater Quality Protection Policy (DLWC, 1998)  
NSW State Groundwater Quantity Management Policy (DLWC, 1998)  
Guidelines for the Assessment & Management of Groundwater Contamination (DECC, 2007)

*Soil*  
Acid Sulfate Soil Manual (DLWC, 1998)

### Traffic & Transport

Guide to Traffic Generating Development (RTA)  
Road Design Guide (RTA)

### Greenhouse Gas

National Greenhouse Accounts (NGA) Factors 2008  
Guidelines for Energy Savings Action Plans (DEUS)

### Waste

Environmental Guidelines: Solid Waste Landfills (EPA, 1996)  
Draft Environmental Guidelines – Industrial Waste Landfilling (April 1998)  
Waste Classification Guidelines (DECC, 2008)  
DECCW Resource recovery exemption

### Hazards

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State Environmental Planning Policy No 33– Hazardous and Offensive  
Development (SEPP 33)  
Planning Advisory Paper No. 6 – Guidelines for Hazardous Analysis  
(DUAP)

**Risk**

AS/NZS 4360:2004 Risk Management (Standards Australia)  
HB 203: 203:2006 Environmental Risk Management – Principles & Process  
(Standards Australia)

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