

**REPORT ON THE ASSESSMENT OF  
DEVELOPMENT APPLICATION NO. 220-7-2002-i  
PURSUANT TO SECTION 80 OF THE ENVIRONMENTAL PLANNING AND  
ASSESSMENT ACT, 1979**

**PROPOSAL BY CARGILL FOODS AUSTRALIA LTD TO  
UPGRADE AND EXPAND THE BOMEN ABATTOIR, WAGGA WAGGA**

**Department of Planning**

**February 2003**

## EXECUTIVE SUMMARY

Cargill Foods Australia Ltd (the Applicant) is proposing to upgrade and expand the Bomen Abattoir at Dampier Street Wagga Wagga, located some 5 kilometres to the north north-east of the township of Wagga Wagga, in the Wagga Wagga local government area (refer to Figure 1).

The proposed development involves upgrading and expanding operations at the existing abattoir in five stages, and includes:

- Demolishing some disused buildings;
- Reconstructing and expanding a major portion of the abattoir, including an administration and amenities building;
- Installing a bio-filter to minimise the odour generated by the abattoir;
- Augmenting and refurbishing the existing wastewater treatment system and discharging 20% of effluent directly to the sewage system;
- Constructing an access road, internal roads, carparking, security gatehouse and associated infrastructure to service the abattoir;
- Increasing production from 850 to 2,000 head of cattle per day; and
- Operating 24 hours a day, seven days a week.

The proposed development is expected to be implemented over a 10-15 year period. The EIS indicates that initially, the operation would remain on a 5 days per week schedule, with production increasing to 6,000-8,000 head per week in the first year following approval. Full production (around 14,000 head per week) is anticipated to be realised approximately 3-5 years from the commencement of construction. At this time, the EIS indicates that the abattoir would move to a 7 day operation. The proposed production increase is expected to occur through performing the killing and boning operations over two shifts per day. Killing is currently undertaken on one shift per day.

The proposed upgrade and expansion involves a capital investment of \$30 millions and would generate an additional 740 new full-time positions at the abattoir.

On 15 July 2002, the Applicant lodged a development application (DA) and supporting environmental impact statement (EIS) for the proposal with the Department.

Under the *Environmental Planning and Assessment Act 1979* (the Act), the proposed development is classified as State Significant, Integrated and Designated Development. Consequently, the Minister is the consent authority for the DA, which requires an additional approval from the Environment Protection Authority (EPA).

The DA and EIS were publicly exhibited between 23 July 2002 and 23 August 2002 by the Department in accordance with the requirements for public participation under Part 6, Division 6 of the *Environmental Planning and Assessment Regulation 2000* (the Regulation).

In response to the exhibition period, the Department received a total of 17 submissions: 7 from government agencies and 10 from the general public. The key issues raised in these submissions include:

- Odour and associated lifestyle impacts;
- Visual;
- Irrigation and wastewater treatment;
- Waste Management; and
- Potential groundwater related impacts.

The Department's assessment of these issues is outlined in Section 6 of this assessment report.

The Department recommends approval of the proposed development, subject to conditions. The recommended conditions of consent set in place rigorous on-going compliance mechanisms, independent reviews and performance audits. These include a number of environmental management plans, an environmental monitoring program with an annual report, requirements for a detailed odour impact assessment to ensure that the abattoir meets the 4 ou criteria at private properties and mechanisms for complaints handling. It is considered that the conditions of the recommended instrument of consent impose appropriate measures to ensure environmental impacts are mitigated, managed and monitored.

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## 1. INTRODUCTION

On 15 July 2002, the Department received a development application (DA) and supporting environmental impact statement (EIS) from Cargill Foods Australia Pty Ltd for the upgrade and expansion of the existing Bomen Abattoir, Wagga Wagga. The Bowman Abattoir site is located at Dampier Street, some 5 kilometres to the north north-east of the township of Wagga Wagga, in the Wagga Wagga local government area (refer to Figure 1).

The existing Bowman Abattoir was originally established on the site in around 1947-50. The current abattoir processes around 850 head of cattle per day, and around 4,250 head per week. The proposed development is seeking consent to upgrade and expand the existing abattoir site to enable the development to maximise the efficiency of the abattoir, to improve odour and wastewater management and reduce holding times for cattle proposed to be processed.

The proposed development involves upgrading and expanding operations at the existing abattoir in two stages, and includes:

- Demolishing some disused buildings;
- Reconstructing and expanding a major portion of the abattoir, including an administration and amenities building;
- Installing a bio-filter to minimise the odour generated by the abattoir;
- Augmenting and refurbishing the existing wastewater treatment system and discharging 20% of effluent directly to the sewage system;
- Constructing an access road, internal roads, carparking, security gatehouse and associated infrastructure to service the abattoir;
- Increasing production from 850 to 2,000 head of cattle per day; and
- Operating 24 hours a day, seven days a week.

The proposed development has a capital investment value of around \$30 million and is expected to provide an additional 740 full time positions on top of the existing 460 employees that work at the site.

This report represents the Department's assessment of the proposed development, in accordance with the *Environmental Planning and Assessment Act 1979*. The Department recommends approval of the development application subject to a number of conditions.

## **2. SITE CONTEXT**

### **2.1 Site Location**

The proposed site is located on Lot 1, 2 & 4 DP 700113, Lot 1 DP 840624, Lot 6 DP 614169 and Lot 11 DP 814225, Dampier Street, Wagga Wagga, in the Wagga Wagga local government area, as shown in Figure 1.

### **2.2 Site Description**

The proposed development has been operating as an abattoir since the early 1950's and has been owned and operated by the Applicant since 1991. As a result, the subject site is characterised by a mix of abattoir buildings, with some buildings from the 1950's, with scattered landscaping around the perimeter of the building. During this time, the abattoir has been expanded and vacated by several owners, creating a mix of buildings styles. Some buildings have been disused and neglected for many years and there are a number of redundant or disused buildings presently on the site.

The abattoir site comprises a total of around 155.8 hectares. The subject site and surrounds generally consists of predominately cleared rural lands. The site itself has been substantially cleared and disturbed due to previous and current landuse activities at the site. The parts of the site that are proposed to be utilised as part of this proposal, consists existing hardstand areas, cleared pasture grassland, lawn and landscape areas.

The abattoir buildings are concentrated within the northern section of the site, with the remainder of the property vacant rural land. Of this area, around 20 ha to the west of the buildings is used for irrigation purposes with the effluent treatment system (approximately 5 ha) and paunch composting area (around 1 ha) located along the western boundaries of this area.

The existing abattoir currently processes around 4,250 head of cattle per week (or some 850 per day) over a 5 day period. Presently, the cattle are received on the south-western side of the abattoir and stored in holding yards and then into cattle holding pens. Cattle for slaughter are usually received on the day or the day prior to processing (later, cattle is stored at the cattle holding paddocks or unsealed holding pens). The cattle are then cleaned in roofed concrete preparation pens where they are cleaned prior to proceeding to the slaughter area. The cattle are then restrained and dispatched, hoisted and cleaned, with the internal organs removed, and then the feet, head and horns removed. Edible organs (such as the heart, lung and liver) are removed and sent to the offal room. Paunch material is removed from the gut and transported into the inedible waste flow.

A final washdown of the carcasses from the kill floor are conveyed to the chilling room located on the eastern side of the abattoir complex. Carcasses are chilled for approximately 20 hours prior to proceeding to the boning room for processing. At this point, the various cuts of meat are made, then sorted and packaged for transportation to various destinations.

The majority of waste is recycled or disposed of at off-site locations. However paunch is partially composted on-site and then removed by a contractor for further composting off-site. The EIS indicates that at some stage off-site paunch composting would occur, but would however be subject to a separate development application.

The operation of the various aspects of the abattoir takes place at different shift times. The main abattoir operations (the dispatching and boning) are undertaken between 6am and midnight. The dispatching of the cattle takes place on the morning shifts and boning is

conducted on both shifts. While the cleaning shifts occurs from midnight to early morning. By-products area generally operates from 7am to 9pm.

The Cargill abattoir employs some 460 people. Of these employees, the EIS indicates that some 320 abattoir workers operate the morning shift, while approximately 90 operate the afternoon shift, 40 are required as office/administration staff and around 10 operate the night shift cleaning staff.

The various components of the Cargill abattoir site described above is illustrated by the attached Figure 2 and Figure 3.

### **2.3 Surrounding Land Uses**

The landuse surrounding the abattoir site is dominated by rural landuse activities, which is typical for the area. The majority of land around the area has been cleared due to previous land based rural activities and is predominantly rural-residential with some holdings located to the west and south of the site, with some industrial landuse to the immediate north of the abattoir.

The closest residence to the abattoir is located on Byrnes Road, approximately 1km to the south of the site. There are also a number of residences located further to the west of the site at Cartwrights Hill, along East Street (approximately 1.2km from the site).

There is also a mix of industry in the vicinity of the site, including a growing industrial precinct (referred to as the Bowmen Industrial Estate) to the north, local-scale industrial to the north, west and east of the site.

Other landuse activities in the surrounding area includes:

- North – industrial landuse and Bomen Road
- East – Main southern railway, Byrnes road and rural-residential landuse beyond
- South – Main Southern railway, Byrnes road and rural-residential landuse beyond
- West – rural-industrial landuse.

The landuse activities surrounding the site are illustrated by Figures 2.2 and 4.1 of the EIS.

### 3. DEVELOPMENT PROPOSAL

#### 3.1 Outline of the Proposal

The proposed development involves upgrading and expanding operations at the existing abattoir in five stages, and includes:

- Demolishing some disused buildings;
- Reconstructing and expanding a major portion of the abattoir, including an administration and amenities building;
- Installing a bio-filter to minimise the odour generated by the abattoir;
- Augmenting and refurbishing the existing wastewater treatment system and discharging 20% of effluent directly to the sewage system;
- Constructing an access road, internal roads, carparking, security gatehouse and associated infrastructure to service the abattoir;
- Increasing production from 850 to 2,000 head of cattle per day; and
- Operating 24 hours a day, seven days a week.

Figures 3.1 and 3.2 of the EIS illustrate the proposed initial and progressive phases of the proposed development.

The proposed upgrade and expansion would generate 1,200 direct full-time positions, with an increase 740 new jobs on existing employment levels and has a capital investment value of \$30 million. An overview of the proposed five stages for the expansion and upgrading of the abattoir is provided below.

**Table 1: Overview of the Proposed Five Stages for the Upgrade and Expansion of the Cargill Abattoir**

| Stage                   | Year Completed | Additional Employees | Capital Cost (\$A) |
|-------------------------|----------------|----------------------|--------------------|
| Loadout/Freezer upgrade | 2003           | 0                    | \$9,000,000        |
| Boning Room upgrade     | 2004           | 100                  | \$9,000,000        |
| Kill Floor upgrade      | 2007           | 60                   | \$6,000,000        |
| 7 day operation         | 2010           | 380                  | \$3,000,000        |
| Full 2000 head/day      | 2013           | 200                  | \$3,000,000        |

The proposed upgrade and expansion of the abattoir is expected to be completed over an approximate eleven year period. The proposed works that would occur are proposed to be undertaken in accordance with the incremental production increase and involves the expansion and significant re-construction of the existing abattoir. The initial phase of development would include:

- Odour treatment improvements;
- Wastewater treatment improvements;
- Refurbishment of the freezers and packing area, and re-construction of the load-out facility at the eastern end of the plant;
- Construction of a new boning, packaging and (limited) load-out building to the west of the existing plant; and,
- New site access

While the progressive building works are proposed to include:

- Construction of new kill floor
- Construction of additional chillers;
- Construction of packaging and load-out facility on the western side of the plant;
- Construction of administration building and amenities building to the north of the plant;
- Construction of standalone cold storage building to the north of the plant; and
- Construction of a new car park to the north of the plant.

Works involving the expansion would involve:

- An increase in load-out facility;
- An increase in chiller capacity
- An increase in freezer capacity;
- An increase in wastewater treatment capacity;
- Improvements in odour controls at the plant; and
- Increase in product cold storage.

The proposed reconstruction activities at the site would occur to the west of the existing plant, with some supporting works to the north (product cold storage) of the plant. While the disused buildings to the west of the abattoir plant (the former skin storage sheds) that are within the footprint of the proposed buildings would be demolished.

Once completely implemented, the abattoir would operate on a 24hr 7 day a week basis, with killing and boning operations occurring on two shifts per day. This would enable the abattoir to increase production to around 14,000 head of cattle per week or 2,000 head per day over a seven day working week.

### **3.2 Justification for the Proposal**

The EIS outlines that the Company requires the proposal to upgrade the existing abattoir operation in order to accommodate the future growth of the Company in the beef meat market and to ensure the on-going feasibility of the abattoir in competitiveness in the meat processing marketplace. The existing plant currently restricts current growth and the proposed reconstruction of the existing abattoir is the preferred option available to the Applicant as it would:

- enable the Applicant to retain existing staff employed at the abattoir;
- enable the Applicant to increase its current production levels without the costs associated with the relocation of the abattoir to an alternative site;
- eliminate the need for on-going maintenance and upgrade of older buildings and equipment at the site; and
- improve the environmental performance of the abattoir and the impacts on the receiving environment.

The EIS indicates that the proposal would also provide important economic input to the Wagga Wagga area. Should the proposal become operational, the EIS indicates that the proposed expansion of the abattoir would result in the generation of around 740 new full-time positions at the abattoir and the generation of indirect employment within the Wagga Wagga area. The EIS also indicates that the employment opportunities provided by the proposal would provide an off-set to the recent decline in employment opportunities in the area, such as with the recent closure of the Laminex Plant and that the proposal would generally boost the local and regional economies.

#### **4. STATUTORY PLANNING FRAMEWORK**

The Department has reviewed the Cargill Abattoir proposal with regard to the various State, regional and local statutory planning provisions that apply to the proposal as required by section 79C of the *Environmental Planning and Assessment Act 1979*. The Cargill abattoir is located within the Wagga Wagga Local Government Area. An overview of the proposal with the various statutory provisions is outlined below, while a more detailed analysis is provided in the Department's Section 79(c) assessment as provided by Appendix A.

##### **4.1 Permissibility**

Under the *Wagga Wagga Local Environmental Plan 1985*, the proposed development is zoned as Rural (1), Industrial (4) and Special Uses (5). Abattoirs and associated activities are permissible with consent under both the Rural (1) and Industrial (4) zoning. Under the Special Uses (5) zoning, abattoirs are permissible without consent.

The objectives of the Rural (1) Zone includes to enable development for the purposes of small holdings or hobby farms on non-prime agricultural land, to ensure development maintains the rural character of the locality and to ensure development is in keeping with the rural character of the locality. The Department considers that since the proposal is located essentially within an industrial zone and has been the site of an abattoir since the 1950's, then the proposal is not inconsistent with the objectives of the zone.

The objectives of the Industrial (4) Zone includes the encouragement of industrial development outside of areas zoned for residential or business purposes, to ensure industrial developments are appropriate and to only allow non-industrial forms of development in the zone provided they do not detrimentally affect the character or amenity of the area. The Department is satisfied that the proposed development is generally consistent with the zone objectives.

The objectives of the Special Uses (5) Zone includes to ensure that certain portions of land within this zone (unhatched in the LEP) are owned or used for public or community purposes and that other land in this zone (hatched in the LEP) would be acquired by a public authority for the particular public or community purpose shown on the map. The Cargill Abattoir is shown as unhatched on the LEP map, however the LEP indicates that the proposed development can occur without the need for development consent. The Department considers that the proposal is consistent with the objectives of the zone.

##### **4.2 State Significant Development**

The proposal satisfies the criteria in Schedule 1 of *State Environmental Planning Policy No.34 – Major Employment Generating Industrial Development* because it is for an intensive livestock operation that would employ more than 20 persons on a full-time basis and has a capital investment of more than \$20 million.

Consequently, the proposal is classified as State Significant Development under Section 76(A)(7)(b)(iii) of the Act, and the Minister is the consent authority for the DA.

### 4.3 Integrated Development

Under Section 91 of the Act, the development proposal is also an 'integrated development', where in addition to requiring development consent, the application requires other approvals or licences from certain other government agencies.

The proposal requires an additional approval from the Environmental Protection Authority under the *Protection of the Environmental Operations Act 1997*. Consequently, it is classified as Integrated Development under Section 91 of the Act.

### 4.4 Designated Development

The proposed development is classified as a designated development under Schedule 3 of the *Environmental Planning and Assessment Regulation 2000* (the Regulation) due to the intention of the development to have the capacity to process more than 3,000 kilograms of live weight per day. The proposed development could therefore be classified as Designated Development.

Director-General's requirements for the EIS were issued to the Applicant on 6 June 2001. The EIS was prepared by HLA-Envirosciences, dated July 2002 and submitted in support of the DA. The Department is satisfied that the Director-General's requirements had generally been addressed and the EIS was adequate to be placed on exhibition.

### 4.5 Relevant Environmental Planning Instruments

The assessment of the proposed development is subject to the following environmental planning instruments:

- *State Environmental Planning Policy No.11 – Traffic Generating Development;*
- *State Environmental Planning Policy No.33 – Hazardous and Offensive Development;*
- *State Environmental Planning Policy No. 55 - Remediation of Land*
- *Wagga Wagga Local Environmental Plan 1985;*
- *Wagga Wagga Development Control Plan 1986;*
- *Development Control Plan No.2 – Road Traffic and Arterial Road Network Strategy;*
- *Development Control Plan No.3 – Flood Mitigation Strategy;*
- *Development Control Plan No.4 – Drainage Strategy;*
- *Development Control Plan No. 5 – Sewer Strategy*

Consideration of the proposed development in the context of the objectives and provisions of these environmental planning instruments is provided below. A more detailed analysis of the relevant provisions of these instruments is included in Appendix A – Section 79C considerations.

A number of State Environmental Planning Policies (SEPP) are relevant to the mine proposal. These are as follows:

#### *SEPP No.11 – Traffic Generating Development*

SEPP No.11 applies to the subject the subject development as the proposal satisfies the criteria listed in Schedule 1 of the SEPP, as an 'enlargement of a building used for industry by more than 20,000sqm gross floor area'. The policy requires the DA to be referred to the Roads and Traffic Authority (RTA) to be granted the opportunity to make any representations on the proposal. The RTA has advised that it has no objections to the proposal subject to a number of recommendations.

The Department's assessment of traffic related impacts are in Section 6 of this Report.

#### *SEPP No.33 – Hazardous and Offensive Development*

SEPP No.33 has the primary aim of ensuring that a consent authority has sufficient information to assess whether a proposal represents hazardous or offensive development and consequently undertake an appropriate assessment regime to appropriately mitigate hazardous and or offensive environmental impacts.

The Department has undertaken its assessment of the proposal under the policy and is satisfied that, with the implementation of mitigation measures required under existing statutory instruments, the proposal would not pose a significant threat to human life or the biophysical environment. Consequently, the proposed development would not be considered to be an offensive or hazardous industry.

#### *SEPP No.55 – Remediation of Land*

SEPP No.55 aims to promote the remediation of contaminated lands for the purpose of reducing the risk of harm to human health or any other aspect of the environment. The policy is to be considered by a consent authority prior to determining a Development Application. The EIS indicates that investigations were undertaken into potential soil contamination on the site associated with the previous actions associated with the abattoir's past operations. This included investigations into the use of underground fuel storage tanks (UST) and previous hide-processing operations undertaken within the sheep skin shed.

The investigations identified that soils adjacent to the fuel oil UST displayed high concentrations of total petroleum hydrocarbons, suggesting that the fuel oil tank and or associated plumbing had been leaking. The EIS indicates that the UST is no longer used as the site now utilises natural gas as fuel supply and that the UST has been removed and the associated land remediated.

The EIS outlines that the investigations into the old sheep skin shed indicated that the soil below the floor of the building and some building timbers are contaminated with arsenic and organochlorine pesticides (OCP's). However, the EIS suggests that the skin shed roof and natural clay layer beneath the building is likely to restrict the migration of contaminants from their localised extent. As these works do not constitute Category 1 works under SEPP No.55, it does not require consent from the Minister for Planning. In order to address any potential contamination issues, the Applicant has proposed to implement a Remedial Action Plan that has been certified by an accredited EPA auditor under the *Contaminated Land Management Act 1997*. The Department has recommended a number of development consent conditions to ensure that appropriate steps are taken prior to the commencement of construction and operational activities. The Department considers that through the implementation of these mitigation measures, that contamination issues should be effectively managed.

There are also a number of Development Control Plans (DCP) that apply to the proposed development. They include:

#### *Wagga Wagga Development Control Plan 1986*

The aim of the DCP is to provide for the regulation of landuses and development within the Wagga LGA. The proposed development is generally consistent with the DCP.

### *DCP No 2 – Traffic and Arterial Road Network Strategy*

The aim of the DCP is to determine the road network and land needed for road reservations for the road traffic generated during the development of the Wagga Wagga LGA. The Department's assessment of the potential road and traffic impacts of the proposal is provided in Section 6 of this report. The Department considers that with the recommended consent conditions, the proposal is consistent with the DCP.

### *DCP No. 3 – Flood Mitigation Strategy*

The aim of the DCP is to develop a flood mitigation strategy for the City of Wagga Wagga and associated areas.

While part of the overall site is located within flood lands, all the elements associated with the proposed development are positioned above the 1 in 100 year flood line. The proposal is therefore consistent with the DCP.

### *DCP No. 4 – Drainage Strategy*

The aim of the DCP is to develop a drainage strategy for the City of Wagga Wagga and associated areas. The strategy recommends a series of drainage works, including pumping stations and detention basins, for development in the Wagga Wagga LGA.

The DCP does not apply to the proposed development, however drainage works, designed in compliance with the general aims and objectives of the DCP, have been proposed as part of the DA (Refer to Section 6).

### *Development Control Plan No. 5 – Sewer Strategy*

The aim of the DCP is to develop a sewer strategy for the City of Wagga Wagga to meet the needs of present and future sewer demands, and to define land needs for sewer needs. The EIS acknowledges that the proposed development would have implications on the City's sewage system due to the need for wastewater discharge from the Abattoir operation.

However in response to the expansion of the Bowmen Industrial area, including the proposed development of the abattoir through this DA, a separate Bomen Industrial Sewage Treatment Plant is to be constructed to handle waste from industries in the area. As a result, the Department has recommended a number of consent conditions to ensure that waste management issues are adequately managed. This includes requirements that any discharge from the proposed development would be subject to a trade waste agreement between the Company and the Council prior to the commencement of construction works, to ensure the Company makes adequate contributions for the to the plant and to ensure and effluent discharge from the site achieve adequate discharge performance standards. Through the proposed development consent conditions, the Department considers that the proposed development is consistent with the DCP.

### **Commonwealth Environment Protection Biodiversity Conservation Act (1999)**

The Environment Protection Biodiversity Conservation Act (1999) (EPBC) commenced on 16 July 2000. One of the key functions of the EPBC Act includes the introduction of a new assessment and approvals system for actions that have a significant impact on matters of national environmental significance (NES). Should an action be determined that it is likely to significantly impact on NES matters (referred to as 'Controlled Actions'), an approval from the Commonwealth, an applicant is required to submit a 'Referral' application to Environment Australia for consideration.

The EIS considers that since the proposal would not impact on any matters of NES, any approval from the Commonwealth Minister for the Environment is not required. The Department supports this position.

## 5. CONSULTATION AND EXHIBITION

The Applicant lodged a DA and EIS for the proposal with the Department on 15 July 2002. The Department was satisfied that the Director-General's requirements had generally been addressed and the EIS was adequate to be placed on exhibition.

The DA and EIS were publicly exhibited from 23 July 2002 to 23 August 2002 in accordance with the *Environmental Planning and Assessment Act 1979*. The DA and EIS were exhibited at the following locations:

- Department of Planning – Head Office, Sydney
- Wagga Wagga City Council Offices
- Nature Conservation Council

The public notification of the proposal was comprehensive, with notices of the proposal placed in the local *Wagga Daily* (on two separate occasions) and on the Department's Website. A number of site signs were also placed on various parts surrounding the proposed DA area, particularly at places near public roads and at the site entrance.

The Department also advised all adjoining and surrounding landowners of the proposed development by letter. The Department consulted the Council concerning the proposed notification area, who advised that they were satisfied.

Submissions were received until the close of the exhibition period. The Department is satisfied that the statutory process for public consultation for the proposal was undertaken in accordance with the *Environmental Planning and Assessment Act 1979*.

In response to the exhibition period, the Department received a total of 17 submissions. Of these submissions, 7 were from government agencies and 10 from the general public. The key issues raised in these submissions include:

- Odour and associated lifestyle impacts;
- Visual;
- Irrigation and wastewater treatment;
- Waste Management;
- Lifestyle impacts; and
- Potential groundwater related impacts.

All submissions from the general public objected to the proposal. However, one submission from the general public did not relate to this proposal.

On 15 August 2002, the EPA stopped the deemed refusal clock on day 15 concerning odour issues. This information was provided by the Applicant on 19 November 2002. The EPA indicated that it was satisfied with the provided information and has granted its General Terms of Approval for the proposal, which have been incorporated into the proposed development consent conditions.

As part of its assessment of the proposal, the Department also requested that the applicant provide some further information, particularly in relation to odour issues. The Department was satisfied with the Applicant's response to this request. A more detailed analysis of the further information requested on odour and how it addressed the

Department's concerns, in addition to the Department's assessment of the issues relating to the proposal, is discussed in Section 6 of this report.

## **6. CONSIDERATION OF ENVIRONMENTAL ISSUES**

The Department has reviewed the DA and the accompanying Environmental Impact Statement for the proposed development, and duly considered all submissions from government authorities, Council and the general public. As a result, the Department has identified a number of environmental issues associated with the proposal. A full consideration of each of the issues listed is provided in Section 6 of this report.

Issues identified include:

- Odour Impact Assessment
- Water and Soil quality and Wastewater Impacts
- Solid Waste Management
- Noise Impacts
- Transport and Traffic
- Visual Amenity and Lighting
- Dust Impacts
- Hazards and Contamination
- Flora and Fauna
- Social and Economic Impacts
- Heritage Issues
- Building Assessment
- Environmental Management

### **6.1 Odour Impact Assessment**

#### *Applicant's Position*

The odour impact assessment was undertaken in section 6.7 of the EIS. A more detailed assessment is provided in Appendix H of the EIS and was prepared by the consultancy firm The Odour Unit Pty Ltd on behalf of the Applicant.

Odour from the abattoir has been a significant on-going problem for the local area. With little or no effective odour mitigation management procedures in place and the gradual encroachment of residential development from the south and west, odour emissions from the abattoir has become an increasing issue for the Applicant and local community.

The EIS indicates that at present, odour from the abattoir originates from a number of sources, with the majority discharged from the rendering plant and auxiliary rendering components, the wastewater treatment system, holding pens and the paunch composting area. To date, any attempts to reduce odour emissions at site have been ineffectual. This can be predominantly attributed to.

- The incinerator at the rendering plant, which is outdated and undersized to effectively reduce odour emissions; and
- The design of wastewater treatment system, which is unsuitable for current wastewater levels and is unable to maintain aerobic conditions.

The Applicant admits that past operations at the abattoir have resulted in adverse odour impacts on residents to the west and south of the plant, and that the severity of these impacts increases during katabatic weather conditions. As part of the assessment of the proposal, odour was identified as the key issue of concern for local residents.

Modelling conducted by The Odour Unit Pty Ltd on behalf of the Applicant indicated that current odour levels at residences within the vicinity of the abattoir significantly exceeded the EPA odour criteria of 4 OU/m<sup>3</sup>, with several residences experiencing levels as high as 10 OU/m<sup>3</sup> (Refer to Figure 4) The Odour Unit Pty Ltd conceded that the levels at these residences, particularly those along Byrnes Road, would increase further during katabatic weather conditions.

The key source of this odour was found to originate from the rendering plant, the auxiliary rendering components, Rotary Screen, the DAF/Clarifier and the Save-all. Paunch was recognised as a significant short-term contributor to odour emissions during maintenance and/or extreme weather conditions.

In providing its assessment on odour issues, the Applicant undertook an assessment of six different scenarios to predict odour impacts from different aspects of the proposal and the implementation of various odour control technologies. The preferred scenario modelled in the EIS examined if all odour emissions from in and around the rendering operation (including those from the DAF/Clarifier, Rotary Screen and Save-All) were captured and treated to remove 90% of the odour concentration, and included the elimination of on-site composting of paunch (referred to as Scenario 5).

The Department requested that the Applicant provide further details in relation to potential odour impacts, particularly on private residents in the area, under Scenario 5. The Applicant indicated that under this Scenario, the level of odour generated during the proposed operations at the abattoir would be significantly lower than that currently experienced. Table 2 below outlines the predicted difference in odour impacts.

**Table 2: Current and Future Odour Levels in the Vicinity of the Proposed Abattoir**

| Receptor                                                                    | Current Odour                       | Proposed Odour                                                          |
|-----------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------|
| Industrial Receptors:<br>north of Cargills                                  | > 10ou                              | Between 2 OU/m <sup>3</sup> and 10 OU/m <sup>3</sup>                    |
| Residential Receptors:<br>Byrnes Rd, south of Cargills                      | Between 2ou and 4 OU/m <sup>3</sup> | Less than 2 OU/m <sup>3</sup>                                           |
| Residential Receptors:<br>Bomen Road, adjacent to<br>Bomen Industrial Area  | Greater than 10 OU/m <sup>3</sup>   | Between 2 OU/m <sup>3</sup> and 6 OU/m <sup>3</sup>                     |
| Residential receptors:<br>East Road, on western side of<br>Cartwrights Hill | Greater than 10 OU/m <sup>3</sup>   | Less than 4 OU/m <sup>3</sup> , mostly less<br>than 2 OU/m <sup>3</sup> |

As illustrated by the above table, the implementation of Scenario 5 would significantly reduce the level of impact currently experienced in the local area. The majority of surrounding receptors would be below 4 OU/m<sup>3</sup>, with only three residential receptors above the recommended criterion (Refer to Figure 5).

Most importantly, the proposed odour impacts do not exceed the 7 OU/m<sup>3</sup> criteria as set out by the EPA's *Draft Policy: Assessment and Management of Odour from Stationary Source in NSW*. Under this policy, no individual should be exposed to ambient odour levels of greater than 7 OU/m<sup>3</sup>, which is the level offensive odours should not occur.

#### *Proposed Mitigation Measures*

To ensure that the Applicant implements the best option for the management of odour impacts, the Department has required that the Applicant implement Scenario 5 as the only option under the development consent. This requires the Applicant to install a biofilter at the abattoir to capture and treat odour emission from rendering plant and auxiliary

components, DAF/Clarifier, Rotary Screen and the Save-all. The proposed biofilter would be designed to remove 90% of the odour concentration.

In addition to these measures, the Applicant is proposing to augment the wastewater treatment system to ensure that it is able to process future wastewater flows and maintain the biological conditions of the system. This in particular would reduce emissions from the aerobic pond, which is currently unable to cope with current wastewater flows.

The Applicant has indicated that on-site paunch composting activities would cease in the near future. However, as this would be dependant on the lodgement of a separate development application by the current contractor, the Applicant was unable to set a timeframe for this removal.

The Applicant claims that these measures, combined with the eventual removal of on-site paunch composting, would ensure that the majority of the surrounding residences would experience odour levels 4 OU/ m<sup>3</sup> or below once the proposed plant is fully operational. Three residences and several industrial developments would continue to experience odour levels greater than the 4 OU/m<sup>3</sup> criteria. However, the Applicant claims that this would be acceptable considering the significant reduction in odour levels currently experienced at these locations.

#### *Issues Raised in Submissions*

All of the submissions from the general public objected to the proposed development due to current and future odour emissions at the abattoir. While some submissions acknowledged the reduction in odour emissions at the plant, the majority of submissions were concerned that:

- the Applicant had not demonstrated adequate management of odour in the past;
- the Applicant did not clearly commit to the treatment of odour from the DAF/Clarifier, Rotary Screen and the Save-all;
- on-site paunch disposal would continue to emit offensive levels of odour and that the proposed expansion would exacerbate existing problems;
- the wastewater treatment system would be prone to breakdowns and that the proposed system would require on-going maintenance to ensure that offensive odours are not emitted; and
- Poor management of the stock pens and holding paddocks would continue to produce offensive levels of odour.

Several submissions requested that the Applicant must be required to conduct regular audits of the proposed development to ensure that the Applicant is complying with the EPA odour criteria.

As part of its assessment of the proposal, the EPA requested further information from the Applicant in relation to potential odour impacts, including the identification of all odour sources, clarification of meteorological data provided, and details in relation to the proposed biofilter. A response to this request was provided to the EPA, who indicated that the information had satisfied their issues, and subsequently provided General Terms of Approval to be incorporated into the consent conditions.

#### *Department's Position*

The Department acknowledges that the abattoir has been responsible for causing some level of odour impact as a result of its existing operations. However, the Department considers that through the proposed development, there is the opportunity for odour issues to be adequately managed and to significantly reduce the level of odour currently experienced by residents within the vicinity of the abattoir.

While three residents would still experience levels above the recommended criteria, the Department does recognise that this would be a general improvement on current odour levels. While a number of private objectors expressed concern about the level of odour impact, some of these submitters outlined that the grounds for objection was if the Scenario 5 option was not implemented in the determination. The Department supported this position and has required that the option be implemented should the proposal be granted approval.

However, the Department believes that odour would continue to be an important issue that could create conflict between the local community and the Applicant if proper management controls are not implemented. Consequently, should the proposed development be approved, the Department has recommended a number of strict consent conditions concerning the management and reporting on odour issues. This includes a requirement for the Applicant to prepare a detailed odour impact assessment within 15 months of the commencement of operations. The assessment is to be undertaken over a 12 month period, in consultation with the EPA and to the satisfaction of the Director-General. As part of this assessment, the Applicant is required to demonstrate that the operation can meet the 4 OU/m<sup>3</sup> criteria and the provisions of s129 of the Protection of the Environment Operations Act (1997) [POEO Act], which requires the site to not emit any offensive odours. The assessment would need to outline the odour mitigation measures that would be adopted and the timing for their implementation. This odour mitigation program will aim to ensure that the 4 OU/m<sup>3</sup> criterion is met by the Applicant at all private properties.

The EPA has advised the Department that it is satisfied with the assessment undertaken by the Applicant and with the proposed odour monitoring and mitigation program required as part of the recommended development consent conditions. However, as part of issuing its General Terms of Approval, the EPA requires that no offensive odours are emitted from the site under s129 of the POEO Act. Notwithstanding this, there are provisions under the Act that provide a mechanism to deal with any potential breaches of the odour criteria and to provide a framework for dealing with the potential odour impacts.

The Department has also included conditions requiring the Applicant to report to the Director-General (after a 12 month period) on the status of finding an alternative off-site disposal site for paunch composting. This should ensure the odour issues relating to the current paunch disposal activities are addressed in the conditions of consent.

Several submissions from the general public were concerned that the Applicant has not adequately maintained mitigation measures and/or facilities at the abattoir in the past, producing significant levels of odour. To ensure that the environmental performance of the abattoir is maintained at a high standard, the Department has recommended conditions of consent that would require the Applicant to submit to the Director-General an Annual Environmental Management Report and an independent Environmental Audit of the facility. As part of these reports, the management of odour and the performance of the odour mitigation controls would be addressed. The Department is confident that these measures would provide an adequate framework for the reporting and, if necessary, implementation of additional odour mitigations controls at the proposed facility.

The Department considers that the recommended consent conditions would provide for a greater level of odour management and should improve the current level of odour impact experienced by certain receptors in the vicinity of the abattoir operation.

## 6.2 Wastewater and Irrigation

### *Applicant's Position*

The slaughtering of cattle and the subsequent processing of by-products requires considerable amounts of water, which in turn produces substantial quantities of wastewater containing various contaminants and nutrients.

Presently, the abattoir utilises 2.2ML of town water per day and produces approximately 2.6 ML of wastewater per day or 500ML per year. This wastewater is collected and passed through the abattoir's on-site Wastewater Treatment System and is then either recycled back to the plant (0.75ML/day), irrigated on land (approx. 40ML/year in summer), or discharged in to the Wagga Wagga Sewage Treatment Plant (1.85ML/day). Refer to Table 3 for the treatment and disposal practices currently implemented at the site.

**Table 3: Wastewater Treatment and Disposal at the Abattoir**

| Stage of Treatment | Process                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Primary Treatment  | Two primary treatment facilities are provided at the abattoir, with wastewater from the 'red' stream (kill floor, rendering, etc) processed through a Contra-Sheer rotating screen to remove solids and wastewater from the 'green' stream (cattle yards, paunch rooms, etc) passed through a shaker screen to remove paunch solids                                                                                                                                                                               |
| DAF Plant          | Both streams are then passed through a Dissolved Air Flotation Tank (DAF) to remove grease and oils from the waste-stream                                                                                                                                                                                                                                                                                                                                                                                         |
| Pond Treatment     | Following primary treatment, wastewater is discharged into a four-series treatment pond system consisting of three anaerobic earthen ponds and one facultative earthen lagoon.                                                                                                                                                                                                                                                                                                                                    |
| Disposal           | Treated wastewater is then discharged into the Council sewer system under a Trade Waste Agreement or is retained on-site for irrigation.                                                                                                                                                                                                                                                                                                                                                                          |
| Irrigation         | Wastewater is spray irrigated on-site during summer months, with a total of 40ML irrigated per year. Kikuyu grass crops are planted to remove nutrients from the soil. Runoff from the irrigation area is captured in the tailwater drains and is then pumped back to the effluent treatment system for further irrigation or sewer disposal. Management proddures for the irrigation land is in accordance with the <i>Bomen Abattoir Effluent Irrigation Environmental Management Plan (Operational)</i> (1998) |

Expansion at the abattoir, with regards to the wastewater treatment and disposal, is currently restricted by the following factors:

- The Wastewater Treatment System, which is undersized and unable to cope with any additional wastewater volumes. Coupled with the accumulation of sludge within the pond system, the ability of the system to efficiently remove nutrient levels in the wastewater has been significantly reduced and has increased the susceptibility of the system to fail;
- The Wagga Wagga Sewage Treatment Plant, which is nearing capacity and is unable to cope with any additional wastewater volumes generated by any new developments. Council has stated that without the construction of the Bomen Industrial Sewage Treatment Plant, it would be unable to accept any wastewater generated by the proposed development; and
- The wastewater irrigation area. Studies indicate that the existing irrigation area has been heavily irrigated in the past, with soil investigations indicating that the soils have negligible capacity to absorb any more phosphorous within the soil matrix.

Notwithstanding this, the Applicant indicates that current irrigation practices on-site do not pose a significant threat to the soil or groundwater quality. In general, the irrigation site exhibits low salinity levels, neutral to slight alkaline pH, and low nitrogen and organic carbon levels. Furthermore, the cation exchange capacity reveals that the soil is capable of sustaining long-term cropping and/or pasture. With respect to groundwater, the Applicant

states that the risk to water quality is minimal, with groundwater believed to be greater than 4.5m below the ground level and the treatment ponds designed to reduce the potential of leakage. The Applicant also states that the irrigation area is located in a region of low vulnerability according to maps provided by the Department of Land and Water Conservation.

However, the Applicant does recognise that without improvements to certain elements of the wastewater system, the increase in wastewater generated by the proposed development could have a significant impact on local water and soil quality, and impact on the capability of the future BISTP to treat wastewater to a level that meets the discharge requirements of the Murrumbidgee River.

#### *Proposed Mitigation Measures*

As a consequence of the proposed expansion, the abattoir would need to increase its use of town water to 3.65ML/day, which would result in an increase in wastewater produced to approximately 4.4ML of wastewater per day. The Applicant states that the utilisation of modern technology and the implementation of various recycling strategies would assist in reducing the expected water usage and wastewater production.

The Applicant considered a number of options for the treatment and disposal of wastewater generated at the proposed abattoir, including the irrigation of all wastewater on and off-site or the discharge of all wastewater to the Council sewer. Based on environmental and economic benefits of each option, the Applicant has proposed to maintain the existing rates of application of effluent irrigation and to marginally increase the volume that is recycled back to the plant. The remainder of the wastewater (and also the majority) would be discharged to the future Bomen Industrial Sewage Treatment Plant (BISTP), (Refer to Figure 6). As discharges to the BISTP would need to satisfy Council's BOD to Nitrogen ratio loadings at the BISTP, 20% of the wastewater generated at the abattoir would bypass the treatment ponds to be directly discharged to the sewer.

However, to ensure that wastewater would meet the discharge requirements of Council and enable the irrigation practices to be sustainable, the Applicant is proposing to implement several key improvements to the WTS. The improvements include:

- the installation of a Hydrocyclone Plant to treat the 'red' wastewater stream to remove 85% of the oil and grease generated at the rendering plant and the kill and boning floor prior to entering the WTS. This would assist in reducing the susceptibility of the treatment ponds to accumulate sludge;
- the retrofit of the existing Dissolved Air Flotation (DAF) Plant to process the remaining streams (the 'green' wastewater stream), thereby increasing its efficiency. This green stream consists of wastewater from the paunch rooms, cattleyard and blood dryer. This would assist in reducing the susceptibility of the treatment ponds to accumulate sludge;
- construction of a 2ML detention basin to collect any overflows from the save-all system and prevent it from being discharged directly into the sewerage system; and
- refurbishment of the wastewater treatment ponds to produce a three pond system of two anaerobic ponds and one facultative pond. These ponds would be constructed to meet the recommended EPA permeability of  $1 \times 10^{-9}$  m/s and to prohibit run-on from surrounding areas.

In addition, the Applicant states that a small aeration basin may be required to be installed prior to sewer discharge. The need for this aeration basin would be determined following commissioning of the new WTS and the Bomen Industrial Sewage Treatment Plant.

With regards to the irrigation of effluent at the site, the Applicant is not intending to make any significant changes to its existing effluent irrigation practices. The Applicant is confident that the upgrade of the WTS would significantly improve the environmental

performance of the irrigation practices due to the reduced content of nutrients in the treated wastewater. Nonetheless, the Applicant notes that irrigation practices must be conducted in a sustainable manner to ensure that the proposed development would not result in the accumulation of nutrients and salts or cause unnecessary waterlogging.

Consequently, the Applicant has determined, based on rates stipulated in the EPA's draft Guideline *Use of Treated Effluent in Irrigation 2000*, that the maximum volume of wastewater able to be applied to the 20ha of irrigation land would be 40ML/year. This volume was determined to ensure that there would be no net increase of phosphorous in the soil matrix. As the 40ML/year represents the same as what is currently applied at the site, the Applicant considers that there would be no increase in the risk to soil, surface water or groundwater as a result of the proposed development.

Nevertheless, the Applicant is proposing to continue the management of irrigation practices under the existing *Bomen Abattoir Effluent Irrigation Environmental Management Plan (Operational)* (1998). This EMP provides a basis for the environmental management of the irrigation activities to ensure that the abattoir meets its statutory responsibilities and the requirements of the company policy. The Applicant states that this EMP would be externally audited, reviewed and updated prior to commissioning. The Applicant also is proposing to implement a separate management plan for the wastewater treatment system to ensure that the system is managed to meet the fluctuating discharge requirements of the BISTP.

#### *Issues Raised in Submissions*

A number of private submissions raised concerns that the treatment ponds lacked sufficient capacity to store wastewater from the proposed development and that the proposed irrigation practices would result in significant off-site groundwater impacts.

Council in its submission raised concerns with the proposed effluent treatment system and the expected wastewater volumes. Primarily it was concerned that the abattoir would be unable to meet the discharge requirements of the future Bomen Industrial Sewage Treatment Plant (BISTP). The Applicant has indicated that the proposed system has been based on the latest information provided by Wagga Wagga City Council regarding the BISTP requirements, and that it has indicated that it would construct an additional aerobic pond should the negotiated Trade Waste Agreement require it.

The Department of Land and Water Conservation (DLWC) raised a number of wastewater and irrigation related concerns, including pasture renovation, groundwater monitoring, the Trade Waste Agreement and the potential for salinity at the site. DLWC recommended a number of conditions, and requested that the Applicant install four monitoring piezometers to ensure that the continuation of irrigation activities at the site would not result in any groundwater or accessions to the watertable. The Applicant has agreed to undertake DLWC's recommendations, which have been incorporated into the recommended Conditions of Consent.

The EPA has raised no concerns in relation to wastewater and irrigation practices, but has provided a number of General Terms of Approval relating to the monitoring and management of the proposed irrigation practices that have been incorporated into the recommended Conditions of Consent.

#### *Department's Position*

The Department considers that the EIS has provided an adequate level of assessment on the potential impacts from the proposed wastewater and irrigation practices on soil and water quality. While the risk to soil, water and groundwater quality from the proposed irrigation activities are unlikely to increase as a result of the proposed expansion, the Department believes that the Applicant should be required to revise and implement a

detailed Effluent Wastewater Management Plan that addresses all components of the wastewater and irrigation practices on site. This plan must include management and monitoring procedures to ensure no long-term accumulation of salts or nutrients at the site, and the prevention of groundwater contamination.

In addition to this plan, the Department has prepared a number of consent conditions in relation to the management of wastewater at the site, incorporating the requirements of DLWC and the EPA's General Terms of Approval. Should consent be granted, these recommendations should be implemented in the development consent.

These recommended conditions include the requirements for the preparation of the following:

- an Effluent Wastewater Management Plan to outline measures to manage soil, surface water and groundwater impacts associated with the irrigation of effluent during the operation of the development. The Plan shall be prepared in consultation with the EPA, WWCC, DLWC and NSW Agriculture;
- the inclusion of the EPA's General Terms of Approval, which include requirements for effluent irrigation monitoring and load based limits;
- a groundwater monitoring program, including the requirements of the DLWC for the location and number of monitoring piezometers; and
- for the Applicant to enter a Trade Waste Agreement with Wagga Wagga City Council prior to the commencement of any construction works. The Applicant is to ensure that wastewater discharged from the site achieves discharge performance standards as set in the Trade Waste Agreement and contributions to be made by the Applicant for the Bomen Industrial Sewage Treatment Plant.

### **6.3 Water and Soil Quality Impacts**

The assessment of the potential impact of the proposal on water and soil quality is provided in Sections 6.1, 6.2 and 6.3 of the EIS.

#### Construction

##### *Applicant's Position*

The proposed construction activities do have the potential to generate erosion and sedimentation impacts if proper management controls are not implemented. The Applicant has considered the level of impact the proposed works could have, and concluded that the risk of erosion and sedimentation during the construction phase to be extremely low. This position is based on the fact that the works would be undertaken on land that is generally hard surfaced and has a slope of generally less than 1%.

Regardless of this, the Applicant is proposing to prepare and implement a Soil and Water Management Plan to minimise the risk of erosion and sedimentation during construction activities. Mitigation measures proposed in this Plan are discussed in section 6.1.7 of the EIS and include measures to contain and direct stormwater to sediment control facilities.

##### *Issues Raised in Submissions*

The Department did not receive any submissions in relation to construction soil and erosion impacts.

##### *Department's Position*

The Department is satisfied that the proposed development does not pose a significant threat to soil and water quality during construction activities if proper management controls are in place. Furthermore, the proposed staging of the works would minimise the extent of disturbance at the site at any one time, minimising the risk of potential impacts on soil and water quality.

Should the proposed development be approved, the Department recommends that the Applicant should be required to prepare and implement a Soil and Erosion Construction Management Plan for each stage of the proposed works. The Plan must be prepared in consultation with the EPA, and must demonstrate that the erosion and sediment control measures comply with the relevant requirements of the Department of Housing's *Soil and Water Management for Urban Development*. The Department is satisfied that the implementation of this plan would adequately manage any potential short-term impact on soil and water quality.

### Operation

#### *Applicant's Position*

The abattoir complex and surrounding land consists of a mix of hardstand and vegetated surfaces that have the potential to generate significant volumes of stormwater that could impact on soil and water quality.

In order to manage stormwater generated at the abattoir, the Applicant has implemented a segregation system to separate contaminated runoff from stormwater generated at 'clean' areas of the site. Stormwater generated at the 'clean areas', which includes roofed or paved areas, is collected and discharged into the Council stormwater system that ultimately discharges into the Murrumbidgee River. Currently only 'clean' runoff from the covered holding pens and old sheep skin sheds is discharged into the Waste Treatment System for treatment.

The Applicant has identified the likely sources of contaminated stormwater at the site, and has implemented several controls to minimise any impact this stormwater could have (Refer to Table 4). The majority of captured runoff at the site is eventually irrigated or discharged into the Council sewer system after undergoing treatment at the on-site Wastewater Treatment System (WTS).

**Table 4: Management of Contaminated Stormwater**

| Source                                  | Management Controls                                                                                                               |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| Small catchment adjacent the save-all   | Collected and discharged into the WTS                                                                                             |
| Save-all overflows                      | Overflows discharged directly to the sewer system if pumps fail                                                                   |
| Sealed ante-mortem cattle yards         | Directed to the save-all and discharged into the WTS                                                                              |
| Paunch composting area                  | Directed to a purpose built detention basin and ultimately piped to the WTS                                                       |
| Unsealed cattle yards                   | Directed to the tailwater dams in the irrigation area for eventual discharge into the WTS                                         |
| Holding Paddocks                        | Natural infiltration. Strict management controls are in place to avoid overgrazing leading to erosion and sedimentation problems. |
| Runoff from Wastewater Treatment System | Designed to exclude runoff from entering and to have capacity for the largest storm event.                                        |

The Applicant states that the proposed development is not likely to alter the sources of contaminated stormwater at the site but is likely to significantly increase the volume and risk to local surface waters.

The Applicant claims that the risk to soil quality is unlikely to change, as sufficient management procedures are in place to limit the risk of erosion at the cattle holding paddocks.

### *Proposed Mitigation Measures*

While the Applicant has identified that the proposed development could increase the risk to local surface waters, no significant change has been proposed for the segregation and treatment of 'clean' and contaminated stormwater or to the current erosion and sedimentation controls in its Operational Environmental Management Plan. The Applicant states that this approach has been taken as it is satisfied that the majority of the current procedures are working satisfactorily.

The proposed improvements to the current system are limited to the following:

- Diversion of the 'clean' runoff from the covered holding pens and old sheep skin sheds to the Council stormwater system; and
- Provision of a contingency save-all pond to capture overflows that would otherwise be directed to sewer should the pumps fail. If the pumps are not operational within half of an operating day, production at the abattoir would cease.

### *Issues Raised in Submissions*

A submission from the Rail Estate expressed concerns regarding stormwater or any runoff from the proposal draining onto the rail corridor.

The submission from Wagga Wagga City Council stated that unauthorised stormwater discharges to the sewer were prohibited.

One private submission questioned the adequacy of the current and proposed surface water/ stormwater controls. No specific concerns were provided.

Three private submissions from the general public claimed that the holding paddocks were severely eroded and poorly managed. One submission states that during wet weather, poor stormwater management resulted in the pooling of runoff, including urine, along the railway line.

### *Department's Position*

The Department is generally satisfied with the arrangements for the capture and discharge of stormwater generated at the site. While the volume of the stormwater is likely to increase as a result of the proposal, the Applicant has taken the appropriate steps to capture and treat any runoff from the proposed facility. The Department is also satisfied that the treatment at the Wastewater Treatment System would provide sufficient treatment for contaminated runoff prior to irrigation or discharge.

However, the detailed design of the stormwater system has not been provided at this stage as it is reliant on the final building design. Consequently, should the Minister determine to approve the proposal, the Department has recommended a number of conditions to ensure the design of the proposed system would guarantee the appropriate management of this water. These conditions would require the Applicant to:

- Prepare the detailed design of the stormwater system in consultation with Council;
- Restrict future stormwater flows from the site to existing flow levels or better;
- Install a Gross Pollutant Trap to ensure that all stormwater discharges do not contain any contaminant;
- Design the stormwater system in accordance with any relevant Council policy and state policies;
- Obtain the Director-General's approval of the stormwater infrastructure prior to the commencement of any construction works; and
- Implement a Stormwater sub-management as part of an overall Operational Water Management Plan.

The Department has also recommended a condition of consent that would require the Applicant to restrict any discharges of stormwater to the sewer system unless otherwise approved.

With regards to the management of stormwater at the holding paddocks, the Department is concerned that stormwater control within this area is reliant on the capacity of the soil to absorb any runoff generated at the site. While the Applicant states that appropriate management procedures are in place at the abattoir, submissions from the general public claimed that the paddocks were overgrazed, compacted and highly eroded. As the proposed development could increase the frequency of cattle being held within the paddocks, the Department believes that robust controls should be implemented to ensure the appropriate long-term management of this area. Consequently, should the Minister determine to approve the proposal, the Department recommends that a surface water and erosion sub-management plan be prepared as part of an overall Operational Water Management Plan. This plan would require the Applicant to detail management procedures that would be implemented to further improve the management of stormwater and soil quality at this site.

The Department is confident that these conditions would ensure that appropriate management controls are in place to minimise any water or soil quality impact associated with the proposed development.

#### Flooding

##### *Applicant's Position*

The EIS indicates that the abattoir complex is situated on fairly level ground at an elevation of approximately 220m AHD. The south-western corner of the site is within the 1 in 100 year flood affected area at 180m AHD and is therefore designated as flood-prone land under the Wagga Wagga LEP.

Approval was granted by Council to allow limited irrigation on this land, however, to date, no irrigation has occurred. The save-all area that is located to the north of the abattoir has flooded on one isolated occasion in the past. Measures have been undertaken since that time to collect and divert any overflows to the sewer or to an earthen bund should the sewer system be malfunctioning to ensure that surface water contamination from spills, is minimised.

##### *Mitigation Measures*

No mitigation measures have been incorporated into the proposal with regards to flooding as it would not be located in flood-prone areas. The Applicant is not proposing as part of this DA to irrigate on the Council approved area.

##### *Submissions*

One submission from the general public raised concerns regarding the utilisation of this site for irrigation, stating that irrigation within this area would pose a threat to water quality should this area be flooded. This submission also stated that irrigation on this site would pose a threat to groundwater quality and nearby aquifers.

##### *Department's Position*

The proposed development, as submitted to the Department, does not incorporate the irrigation of the CFA 'Low' land, or include the surrendering of this Council-approved consent. As Council approved the irrigation practices on this land, any requirement for controls on these practices would be Council's jurisdiction.

Consequently, as the proposed development would not be located in any flood-prone areas, the Department does not consider flooding to be a risk to the proposed facility. The Department is also satisfied that appropriate measures have been taken to ensure that the proposed Wastewater Treatment System is designed to have sufficient capacity for peak-storm events.

## 6.4 Solid Waste Management

### Construction

#### *Applicant's Position*

The Applicant states that solid waste would be generated during construction. It is noted that the majority of the waste would be non-hazardous and would be disposed of to a licensed landfill in accordance with the Construction Environmental Management Plan (EMP) for the project. It is not proposed to take any fill from the site following earthworks, and no other materials are expected to be wasted during construction.

Due to the age of the buildings that are proposed to be demolished, the Applicant has indicated that asbestos would be present and would require disposal. This would require specific management controls to ensure that it would not generate any adverse impacts.

#### *Issues Raised in Submissions*

Wagga Wagga City Council requested that appropriate controls are implemented to ensure that asbestos waste is appropriately managed.

#### *Department's Position*

The Department is satisfied that the implementation of a Waste Construction Management Plan would be adequate in minimising and/or managing waste generated during the proposed construction works. Should the Minister determine to approve the proposal, the Department has recommended that the Applicant prepare the Plan prior to the commencement of any construction works. In addition, the Department has recommended a condition that requires the Applicant to ensure that asbestos waste is appropriately handled and disposed of in accordance with the relevant guidelines.

The Department is confident that these conditions would ensure that the production and impact of waste is adequately managed and minimised during construction activities.

### Operation

#### *Applicant's Position*

Due to the nature of the operations at the abattoir, the proposed development would generate a range of waste products. The EIS outlines that although the relative amounts of wastes would increase with the proposed expansion (Refer to Table 5), the Applicant states their method of disposal and/or processing is not proposed to be amended under this application.

**Table 5: Current and Projected Volumes of Waste Generated During Operations**

| Waste Type               | Current (850 head per day) | Future (2000 head per day) |
|--------------------------|----------------------------|----------------------------|
| Garbage                  | 1.5 tonnes/day             | 3 tonnes/day               |
| Cardboard (all recycled) | 1 tonne/ 5 days            | 1.5 tonnes/5 days          |
| Laboratory Waste         | 3 kg/week                  | 4.5 kg/week                |
| Paunch Compost           | 1500 tonnes/annum          | 3500 tonnes/annum          |
| Dead Stock               | 1.5 tonnes/week            | 2.5 tonnes/week            |
| Oil Recycling            | 750 L/month                | 1200 L/month               |

In relation to paunch management, the EIS notes that paunch waste is currently composted on-site by a contractor. Under the proposal it is planned to remove this paunch waste from site for composting off-site by a contractor. At this stage the Applicant envisages that the off-site paunch composting would commence prior to the expanded facility beginning operations. However, this proposal is dependent upon a suitable contractor obtaining development consent for off-site composting that is not sought under this application. Therefore, for the purposes of the proposal, paunch composting has been assumed to be continuing on-site.

In addition to general abattoir waste streams, the Applicant has indicated that it would be undertaking regular de-sludging of the wastewater treatment system to ensure that the efficiency of the treatment ponds are maintained. This would generate the need for the on-going disposal and management of this bio-solid waste. The Applicant has indicated that it would prefer to treat this waste at the paunch composting area.

#### *Issues Raised in Submissions*

Submissions from private individuals also raised the issue of paunch management, including concern about the removal of paunch offsite without consideration of prevailing weather conditions, and the potential for paunch to attract pest/scavenger birds and generate odour impacts.

DLWC recommended that the Applicant consult with NSW Agriculture and DLWC regarding alternative disposal options for the sludge and to develop appropriate management procedures for this waste. The Applicant has agreed to these recommendations, which have been incorporated into the recommended conditions of consent.

Wagga Wagga City Council queried how the increase in paunch would be managed.

#### *Department's Position*

The Department considers that the key issue in relation to waste management relates to the disposal of paunch on the site. As outlined above, the EIS indicates that the Applicant is not proposing to alter the existing paunch practices on-site as part of this proposal and that any proposal to move the disposal off-site is dependent on a separate development application. Should development consent be granted, the Department has recommended that a specific condition be implemented in concerning the disposal of paunch off-site. The condition requires the Applicant to report to the Director-General of the status of a development application for the off site disposal of paunch, within 12 months of the commencement of operations. Should the paunch disposal continue on site following the 12 month period, the Applicant is required to outline the timeframe for moving the paunch disposal to an alternative location.

In relation to the management of other waste related issues, the Department has also recommended a number of other conditions to ensure these issues are adequately managed. This includes the preparation and implementation of a Waste Operational Environmental Management Plan, with particular focus given to the disposal and management of sludge, and the procedures at the paunch composting area. The Department is confident that these conditions would ensure that the production and impact of waste is adequately managed and minimised at the site.

### **6.5 Noise Impacts**

The Applicant has assessed the potential impacts of noise from the proposal in Section 6.8 and Appendix 1 of the EIS. Appendix I provides a more detailed technical report regarding the potential noise impacts, and was prepared by HLA-Envirosciences' Acoustic Unit.

The EIS indicates that the potential noise sources associated with the construction and operation of the proposal would include noise from the abattoirs processing activities such as the pet food and skinning area, offal room, render area, boiler room, rooftop extraction fans and truck movements. To assess the potential impact of the various aspects of the abattoirs operations, the Applicant used the Environmental Noise Model. As part of the assessment of potential noise impacts, the noise model considers the distance of the proposal to receptors, barriers to the proposal, weather influences and various recommended noise control measures. The noise levels from the various potential noise sources were considered as part of the model to calculate the potential noise levels at residential receivers in the area.

#### *Applicant's Position*

The EIS indicates that construction activities associated with the proposal would include works associated with demolition works, site preparation works, including some excavation, concrete works including formwork and the erection of buildings. The EIS outlines that construction work is expected to occur for a period greater than 4 weeks but less than 26 weeks.

The EIS indicates that under the EPA's Industrial Noise Policy (INP), the construction noise criteria would be 42 dB(A). The EIS indicates that noise resulting from construction activities at the nearest private residents on Byrnes Road would satisfy the construction noise criteria.

Operational noise from the abattoir proposal would include noise associated with the use of the loadout facility, cooling chillers and cattle processing facilities. The EIS outlines that under the EPA's INP, an intrusive noise criteria [or background noise levels plus 5dB(A)] would apply to the operation of the site. The EIS indicates that the operational intrusive noise criteria would be Day 37 dB(A), Evening 38 dB(A) and Night 35 dB(A). The EIS indicates that all operations from the abattoir would meet the operational noise criteria at all private residences.

The Applicant indicates that the impacts from potential Sleep Arousal were assessed as part of the application. The potential sources of sleep arousal that were assessed included noise associated with trucks unloading cattle, reversing alarms and the tailgates of trucks slamming. The EIS outlines that the Sleep Arousal Criteria is determined by background noise levels plus 15 dB(A) and applies during the hours of 10pm to 7am. In order to assess the potential impacts on sleep arousal, the EIS applied to the sleep arousal criteria to those residents along Byrnes Road who are the closest private people to the abattoir. The EIS concludes that the sleep arousal noise impacts from the proposal would be at or below the 45 dB(A) criteria.

The EIS outlines that traffic noise generated by the proposal may result from cattle delivery trucks and dispatch vehicles associated with the development. Noise associated with traffic activities is assessed separately to site noise impacts and is considered using the EPA's Intermittent Traffic Noise guidelines. The EPA's Environmental Criteria for Road Traffic Noise (ECTRN) recommends that the criteria be 60 Leq(1 hour) [between 7am-10pm] and 55 Leq(1hr) [between 10pm-7am]. The EIS outlines that traffic noise generated by the proposal would meet the relevant traffic noise criteria.

#### *Proposed Mitigation Measures*

Section 6.8.9 of the EIS outlines the proposed noise mitigation measures the company proposes to implement to manage potential noise impacts from the abattoir. These measures include ensuring potential loud or noisy equipment operates during the least sensitive part of the day, ensuring all equipment and processes are well maintained and

regularly serviced and the undertaking of noise monitoring at sensitive noise receptors to ensure the relevant noise criteria are being met.

#### *Issues Raised in Submissions*

There were two private submissions received by the Department that raised concerns about the potential noise impacts resulting from the proposal. This included noise impacts associated with the operation of the plant and noise associated with truck movements, particularly at night.

#### *Department's Position*

The Department considers that the EIS has provided an adequate assessment of the potential noise impacts associated with the proposal and is supportive of the proposed mitigation measures described in the EIS. This position is supported by the EPA who raised no concerns about the methodology used in the EIS to determine the noise impacts and also raised no concerns about potential noise impacts that may arise from the proposed development.

The Department recommends if consent is issued for the proposal, a number of noise related conditions be included to ensure that noise from the abattoir is effectively managed. This includes the implementation of specific noise criteria, including for sleep arousal and operational noise, requirements for noise audits to be undertaken to ensure the proposal is complying with the noise criteria, requirements for a noise monitoring program to be undertaken and requirements for the preparation of a noise management plan. The Noise Management Plan is required to be prepared to the satisfaction of the Director-General and would be required to address both construction and operational noise related issues.

As a result, the Department considers that noise from the proposal should be adequately managed through the recommended conditions of consent.

## **6.6 Traffic and Transport Assessment**

#### *Applicant's Position*

The traffic and transport impact assessment is provided in section 6.10 of the EIS. A more detailed assessment is provided in Appendix J of the EIS and was prepared by TEF Consulting Pty Ltd, on behalf of the Applicant.

#### Existing Traffic

The abattoir generates traffic via the following sources – cattle and other deliveries, product dispatch and employee vehicles. Vehicles deliver 850 head of cattle to the abattoir each day, in addition to the 460 employees operating on three shifts. The majority of workers (350) are on site between 6am and 3pm with an additional 40 office workers between 9am and 5pm.

The Applicant proposes to expand cattle processing operations from 850 head per day over 5 days per week, to 2000 head per day, 7 days per week. In addition, a new entry would be provided for cattle delivery using the disused road on the western side of the complex. The existing access would be used by staff, dispatch trucks and service vehicles. As a result of the increased production, killing as well as boning would be undertaken during the 3pm to 12am shift and would require a greater number of employees for that shift as well as a commensurate increase in delivery and dispatch truck movements. Current traffic distribution for deliveries and workers are shown in the following tables.

**Table 6: Existing Abattoir Transport Traffic Distribution**

| Route                        | Cattle Delivery |            | Other Deliveries |            | Product Dispatch |            |
|------------------------------|-----------------|------------|------------------|------------|------------------|------------|
|                              | Vehicles        | %          | Vehicles         | %          | Vehicles         | %          |
| Olympic Highway northbound   | 16              | 42         | 1                | 6          | 0                | 0          |
| Sturt Highway westbound      | 8               | 21         | 3                | 17         | 3                | 10         |
| Olympic Highway southbound   | 10              | 26         | 0                | 0          | 3                | 10         |
| Sturt Highway eastbound      | 3               | 8          | 1                | 6          | 18               | 60         |
| Wagga via Olympic Highway    | 1               | 3          | 9                | 50         | 6                | 20         |
| Wagga via Sturt Highway east | 0               | 0          | 2                | 11         | 0                | 0          |
| Local roads                  | 0               | 0          | 2                | 11         | 0                | 0          |
| <b>Totals</b>                | <b>38</b>       | <b>100</b> | <b>18</b>        | <b>100</b> | <b>30</b>        | <b>100</b> |

**Table 7: Existing Traffic Distribution of Workers**

| Route                          | Vehicles  | %          |
|--------------------------------|-----------|------------|
| Olympic Highway northbound     | 0         | 0          |
| North-west via Olympic Highway | 12        | 13         |
| North-east via Byrnes Road     | 8         | 9          |
| Sturt Highway westbound        | 4         | 4          |
| Olympic highway southbound     | 1         | 1          |
| Sturt highway eastbound        | 12        | 13         |
| Wagga via sturt highway east   | 9         | 10         |
| Wagga via Olympic highway      | 38        | 40         |
| Wagga via local roads          | 3         | 3          |
| Local roads                    | 7         | 7          |
| <b>Totals</b>                  | <b>94</b> | <b>100</b> |

**Predicted Future Traffic**

Heavy vehicle movements as a result of the proposed development are anticipated in the range 63 to 126 per day, an increase of almost 100-200%. Cattle delivery traffic volumes from the east are anticipated to remain as present. Additional deliveries would be predominantly from the south west (60%) and from the north (40%) using the Olympic Highway. The incidence of B-Double vehicles entering the site is expected to increase from approximately 40% to 70%. The increase in heavy vehicle traffic was considered to be unlikely to have a significant impact on local traffic conditions. An analysis of the Olympic Highway/Edward Street and Sturt Highway/Eunony Bridge Road intersections indicate marginal increases in average delays and no change in levels of service (LoS). Both intersections currently operate at LoS B which is good operation with acceptable delays and spare capacity.

An additional 290 employees (based on the 5 days per week operations) would be required for the increased operations. These include 260 for the 3pm to 12am shift, 20 additional clean up workers (12am to 3am) and 10 additional administrative staff members. Seven day per week operations would result in additional employees for all shifts for the additional 2 day operations (ie approximately 750 employees per day on Saturdays and Sundays). Peak travel periods for workers occur one to two hours earlier than the existing general commuter peak at the intersections reviewed above. It is concluded that the turning traffic volumes at these intersections would remain substantially lower than during the commuter peak periods and that there would be little or no impacts from the additional traffic.

### *Issues Raised in Submissions*

Issues relating to traffic and transport were raised in one submission to the proposed development. This related generally to the accuracy of the assessment in the EIS. Other submissions raised the issue of traffic noise. These are dealt with in the section regarding noise impacts.

Submissions raising the issue of traffic were raised by both Wagga Wagga City Council and the Roads and Traffic Authority (RTA). The RTA had no objection to the proposal subject to upgrading of the intersections of Eunony Bridge Road/Oura Road, Oura Road/Burns Road and Burns Road/Dampier Street. However, the Council found that there were no specific projects in the network which would require implementation or upgrade as a direct result of the abattoir. Council also identified the long term proposal for grade separation of the rail crossing and Byrnes Road which would need to be considered in terms of investigation and negotiation with landholders in any consent for the proposal.

The Roads and Traffic Authority in responding to the EIS raised the need for the Applicant to upgrade the Eunony Bridge Road/Oura Road, Oura Road/Burns Road and Burns Road/Dampier Street intersections. Notwithstanding, Wagga Wagga City Council stated that it was satisfied with the modelling undertaken for the assessment of the effects on the arterial road network and that there are no specific projects in the network which would be require implementation or upgrading as a direct result of the abattoir expansion. Council has also noted that increasing development in the Bomen area, including the proposal, would result in a need to upgrade some intersections over the next 10 years, however the current Section 94 plan does not allow Council to require contributions from the Bomen area. Further, construction of the entire upgrade would not be complete for 10 to 15 years from the date of consent and therefore maximum capacity/operations would not be achieved until then, therefore by the time maximum traffic is generated by the development, Council may have upgraded the intersections under its works program.

### Construction Traffic

The Department notes that the Applicant has not considered construction traffic impacts. However, given the staged construction programmed over the next 10 to 15 years and in periods from 4 to 26 weeks, it is considered unlikely that there would be significant long term traffic impacts result. In order to ensure that construction traffic is not likely to have a significant impact on general traffic operations, the Department recommends the inclusion of a condition requiring the preparation of a Construction Traffic Management Plan to be submitted prior to the commencement of each construction stage which outlines the type of construction traffic/equipment, transportation to the site, access and egress, and impacts on surrounding roads and intersections.

### Operational Traffic

Data provided in the EIS indicates that heavy vehicle movements to and from the site would virtually double with increased production. Access routes would remain more or less as those currently used. It is not clear the number of additional vehicle movements would be associated with the proposed development, however based on the number of additional employees (assuming 75% vehicle usage) and the increase in heavy vehicle numbers, this is anticipated to be in the order of 260 vehicles (520 movements) per day. The majority of these movements would be in the 2.30pm to 3.30pm peak where the largest changeover period occurs between morning and afternoon shifts. This period would also provide the greatest potential for on-site traffic impacts where up to 500 vehicles (250 entering and 250 leaving) would be manoeuvring within the site. Construction of an additional 400 space carpark near the new western access would mitigate this. However, the Department has recommended conditions which require that all vehicles associated with the construction and operation of the development shall be accommodated on the site at

all times and that sufficient carparking is provided for the maximum number of vehicles (including employees, customers/visitors and service vehicles) at any time.

Most intersections in the general vicinity of the site currently operate at Level of Service "A" with some at LoS "B". Future traffic related to the increased capacity/production of the abattoir would have little effect on the operation of these intersections, which would continue to operate at LoS "B" or better.

#### Road Safety

Boom gates have been added to the Bomen level crossing to improve safety following a fatal accident between a B-double and XPT in January 2001. Safety issues have arisen at the intersections of Watabadgery Road with Eunony Bridge Road and Byrnes Road where large combination vehicles have experienced difficulty with turning manoeuvres. Council has included upgrades to these intersections in its long term works program for road and intersection improvements. As stated above, Council does not consider that these upgrades would be required as a direct consequence of the proposed abattoir upgrade nor does the current Section 94 contributions plan enable it to levy the development for these upgrades.

#### *Department's Position*

In conclusion, the Department considers that the traffic impacts of the proposal would be minimal due to the timing of shifts which ensure major traffic generation as a result of the proposal is outside the main peak periods. Internal traffic conflicts would be resolved by the construction of a new car park and construction traffic would be managed by the implementation of a construction traffic management plan to be submitted to the Director-General for approval prior to each construction stage of the development.

### **6.7 Visual Amenity and Lighting Impact Assessment**

#### *Applicant's Position*

The Applicant assessed the potential visual related impacts associated with the proposal and presented its findings in Section 6.13 of the EIS. The EIS suggests that the potential sources of visual related impacts from the proposal would include the additional buildings to be constructed immediately to the west of the existing abattoir complex. While a proposed stand alone cold storage building situated on the northern side of the abattoir may also result in some visual impacts.

The EIS outlines that the visual amenity of the general area is dominated by the Bomen Industrial Estate, cleared agricultural land and the existing abattoir complex. The EIS indicates that the proposed development would substantially increase the bulk of the total development, with the majority of building extensions to the west and north of the plant replacing redundant buildings or open space.

The Applicant claims that although the bulk of the abattoir would increase, the proposed development would not have a significant visual impact as:

- The proposed extensions would replace redundant and dilapidated buildings;
- The proposed extensions would be compatible with the existing complex; and
- The existing landscaping program along the railway easement would reduce the visual impact when viewed from Byrnes Road and the Main Southern Railway.

The EIS indicates that the receptors potentially affected by visual amenity were identified by the Applicant and include:

- Adjacent industrial landusers;
- Commuters on Byrnes Road;
- Commuters on Bomens Road;
- Train commuters on the Main Southern Railway line.

The Applicant states that the abattoir is not significantly visible from any residential dwellings.

The additional buildings proposed means the abattoir would appear much larger (laterally) than the existing abattoir complex when viewed from the receptors listed above. The proposed cold storage building would be clearly visible to commuters on Bomen Road and industrial land users.

The Applicant considers that the proposal would not have an impact in the visual amenity of the area as the new buildings would be compatible with the existing abattoir.

#### *Proposed Mitigation Measures*

While the EIS indicates that the proposed development would not have a significant visual impact, the Applicant is proposing to landscape areas surrounding the proposed cold storage building and access driveway to reduce the visual impact of the abattoir when viewed from the north. Existing landscaping at the site is generally limited to the areas surrounding the main abattoir buildings and soil rehabilitation areas around Cartwrights Hill.

While the proposed landscaping works are restricted to certain areas on the site, the Applicant states that they have undertaken recent landscaping works to assist in reducing the current and future appearance of the abattoir. These works include:

- Landscaping areas along the western, northern and eastern sides of the main abattoir buildings with formal plantings consisting of native and exotic species;
- Rehabilitating lands within the abattoir's buildings caused by overgrazing around Cartwrights Hill and surrounds; and
- Implementing a significant tree planting project along the eastern side of the site – of around 30,000 trees alongside the railway easement.

The Applicant states that the current landscaping plan along the railway easement would reduce the visual impact of the existing abattoir and proposed development when viewed from Byrnes Road and the main Southern Railway.

The Applicant has not proposed any significant changes to the existing lighting arrangements or proposed any controls to reduce the impact on surrounding receptors.

#### *Issues Raised in Submissions*

There were 5 submissions from the general public who raised concerns regarding the visual impact of the proposal. The issues raised included:

- Visual impact of the abattoir and the lack of adequate landscaping, especially from residential areas along Byrnes Road;
- Lighting that spills into neighbouring properties;
- Poor visual amenity of the proposed buildings due to poor building design; and
- Current landscaping attempts are extremely poor, and usually dies due to lack of maintenance.

### *Department's Position*

The Department considers that due to the lack of maintenance and substantial landscaping, the visual appearance of the existing abattoir is generally poor. However, given the context of the existing visual amenity of the area, the Department considers the incremental increase in impact from the additional buildings would not be significant.

Furthermore, as the Applicant is proposing to demolish redundant buildings and provide additional landscaping around the new abattoir buildings, it is considered that the visual impact of the existing site can be improved and managed.

However, several submissions from the general public identified lighting control, maintenance of landscaping and the general urban design of the facility as key contributors to improving the general appearance of the abattoir.

To ensure that the visual amenity of the proposed development is improved and maintained throughout the life of the facility, the Department has recommended a number of consent conditions to be implemented to manage potential impacts, should the proposed be approved. These conditions would require the Applicant to:

- to prepare and implement a Landscape Management Plan for the site in consultation with the Council and to the satisfaction of the Director-General. The Plan would be required to outline the measures to ensure appropriate development and maintenance of landscaping on the site;
- to consult with Wagga Wagga City Council on the external design details of the proposed buildings;
- to ensure lighting from the site is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses and be the minimum level of illumination necessary, and be in general accordance with *AS 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting*

The Department is satisfied that these controls would ensure that the visual impact on the surrounding area is appropriately mitigated and managed for the life of the facility.

## **6.8 Air Quality Impact Assessment**

### *Applicant's Position*

The Applicant has assessed the potential air quality impacts from the proposal in Section 6.6 of the EIS. Appendix H of the EIS provides a more detailed technical report regarding the potential air quality impacts, and was prepared by The Odour Unit. The Department's consideration of odour related impacts is not provided in this part of the report but is however outlined in Section 6.1 of this Report.

The Applicant states that no routine air quality monitoring is conducted at the abattoir and no previous air quality studies have been conducted at the site. The Applicant notes that the abattoir is located in a rural region where existing air quality is regarded as good.

The EIS indicates that emissions from the boilers are discharged via a stack approximately 25m in height. The main air pollutants discharged are oxides of nitrogen (4.0 tonnes per year) and carbon monoxide (3.3 tonnes per year). While the EIS also indicates that there is the potential for short term increases in local incidences of dust impacts during the construction stage due to the surface preparation of the site and earthmoving related activities.

In relation to operational impacts, the Applicant states that emission sources for the proposed development would be identical to the existing sources. The EIS suggests that

the proposed intensification of production would significantly increase the total volume of combustion and processing emissions. With regard to particulate emissions (dust), the Applicant suggests the proposal has the potential for significant increase in dust if operations are not managed with respect to cattle holding on unsealed areas of the site.

#### *Proposed Mitigation Measures*

The Applicant proposes to mitigate potential dust and air quality related impacts through a Construction Environmental Management Plan. The proposed conditions of consent require a Dust Management Plan be provided in the Construction EMP. The proposed mitigation measures include:

- Dust generating activities (i.e. earthmoving) shall be avoided during dry and windy conditions;
- Watering of the exposed areas of the construction site and access roads during dry and windy conditions;
- All disturbed areas would be stabilised – compacted, sealed or vegetated;
- Any stockpiles shall be covered or kept moist during dry and windy conditions;
- Trafficable areas shall be clearly defined to prevent vehicle movements on disturbed areas and speed limits on site put in place;
- Any vehicle that collects mud on its tyres shall utilise the sites truck wheel wash prior to exiting the site; and
- All equipment used on site shall be maintained in an efficient condition and operated in a proper manner.

The EIS also suggests that measures to manage potential dust impacts resulting from the overgrazing by stock would be managed within the existing Bowmen environmental management plan.

#### *Issues Raised in Submissions*

Aside from odour, the issue of air quality was not raised in submissions.

#### *Department's Position*

The Department considers that the EIS has provided an adequate assessment of the potential air quality related impacts associated with the proposal and is supportive of the proposed mitigation measures described in the EIS. This position is supported by the EPA who raised no concerns about the methodology used in the EIS to determine the air quality impacts and also raised no concerns about potential air quality impacts that may arise from the proposed development. The requirement of the EPA to ensure that activities on the site are undertaken in a manner to minimise emissions of dust from the site has been incorporated into the consent conditions.

Should the Minister decide to grant development consent, the Department recommends a number of development consent conditions be implemented to ensure that dust from the site is effectively managed and monitored. This includes specific requirements for the preparation of a Dust Management Plan to the satisfaction of the Director-General which would include provisions for the implementation of dust control works and contingency measures should impacts occur. The conditions also include requirements for the preparation of environmental management plans for the management of aspects of the abattoir that may potentially generate dust, including the cattle yard areas and exposed surface as part of a Landscape Plan.

As a result, the Department considers that dust from the proposal should be adequately managed through the recommended conditions of consent.

## 6.9 Contamination

### Construction

#### *Applicant's Position*

The EIS identifies that the potential sources of soil contamination on the site include underground fuel storage tanks, and previous hide-processing operations undertaken within the sheep skin shed. An *Environmental Site Assessment*, aimed at investigating these sources, was conducted in 1996. The investigation included:

- drilling and investigation of boreholes adjacent to the two underground storage tanks (USTs). A total of eight soil samples were analysed for fuel-related contaminants (ie total petroleum hydrocarbons (TPH), benzene, toluene, ethyl benzene, xylene (BTEX), and volatile halogenated organic hydrocarbon (VHCs));
- drilling and investigation of ten boreholes within the skin shed area, and collection of wood samples from the skin shed building. A total of 10 soil samples and 5 wood samples were analysed for arsenic and organochlorine pesticides (OCPs).

The EIS notes that the investigation found that soils adjacent to the fuel oil UST displayed high concentrations of TPH, indicating that the fuel oil tank and/or the associated plumbing had been leaking. This UST is no longer used as the site now utilises natural gas as fuel supply, and consequently the UST has been removed and the associated land remediated.

It is stated that no contamination was identified adjacent to the leaded petrol UST. This UST is still in use and when it is decommissioned, it would be removed in accordance with Cargill policy and the recommendations of the 'Environmental Site Assessment' report.

Results of the soil samples and wood samples from the old sheep skin shed indicated the soil below the floor of the building, and the building timbers that were associated with skin treatment, are contaminated with arsenic and OCPs. It was stated that the skin shed roof, and the natural clay layer beneath the building would likely restrict the migration of contaminants from their localised extent.

#### *Proposed Mitigation Measures*

The Applicant identifies that the old sheep skin shed is to the west of the abattoir complex on an area which would be disturbed and built upon for the proposed development.

To manage this risk, that EIS states that a Remediation Action Plan (RAP) would be prepared to manage the arsenic/OCP contamination associated with the sheep skin shed. The EIS notes that an EPA accredited auditor would be involved in the preparation of the RAP, and would provide confirmation via a site audit statement that the site is suitable for the proposed landuse (following remediation if required). The site audit statement would be sought prior to the commencement of any site works.

#### *Issues Raised in Submissions*

One submission from the general public raised concerns regarding contamination.

Wagga Wagga City Council requested that the Applicant prepare and implement a Remedial Action Plan for the remediation works at the old sheep skin shed.

#### *Department's Position*

The remediation works for the abattoir site do not constitute works that require consent from the Minister of Planning under SEPP 55. The Applicant has not specified the exact timing of the remediation works, but indicates that it would be completed before the commencement of any works at that location.

To ensure that the construction activities do not disturb any contaminated soil or interfere with the remediation works, the Department has recommended a number of conditions, should the Minister grant development consent. These conditions would require the Applicant to:

- provide a copy of the Remedial Action Plan for the site that has been certified by an accredited site auditor under the *Contaminated Land Management Act 1997*
- provide a short report detailing how the remediation works would be coordinated with the construction activities, and the measures to be implemented to manage any potential impacts; and
- ensure that the construction of any component of the development does not occur on any part of the site that has yet to be remediated and validated by a site auditor accredited by the EPA;

Furthermore, the Applicant is unable to occupy the proposed development until the site has been validated by an EPA accredited officer and is suitable for the proposed commercial/industrial use.

The Department considers that through the implementation of these mitigation measures, that contamination issues should be effectively managed.

### Operation

#### *Applicant's Position*

The Applicant considers that the risk of soil and groundwater contamination associated with the on-going operations of the proposed development is low. The Applicant claims that the proposed abattoir operations would not utilise or generate significant amounts of (non-biodegradable) potentially contaminating substances.

To ensure that future activities at the site to do not lead to any contamination, the Applicant is proposing to:

- provide adequate bunding at all fuel and storage areas to prevent contamination and all equipment inspected regularly to ensure functionality.
- store chemical, fuels and cleaning materials undercover or in bunded areas to minimise any risk of stormwater contamination.
- Ensure that clean up operations in the vicinity of fuel, chemical and oil storage areas are dry cleaned where possible to avoid contaminants reaching the stormwater system, followed by washdown to the effluent system

#### *Issues Raised in Submissions*

No submissions received by the Department have concerns regarding soil contamination during the proposed operations.

#### *Department's Position*

The Department is satisfied that the proposed measures would be adequate in mitigating the potential for future soil and groundwater contamination. Should the Minister determine to approve the proposal, the Department recommends that the Applicant must be required to:

- store all chemicals, fuels and oils in appropriately bunded areas that have sufficient capacity to store 110% of the largest container stored;
- design and install the bunds in accordance with the EPA's Environmental Protection Manual Technical Bulletin Bunding and Spill Management; and

The Department is satisfied that these requirements, in conjunction with the measures proposed by the Applicant, would ensure the minimisation of risk to soil and groundwater during the operations at the proposed development.

## 6.10 Flora and Fauna

### *Applicant's Position*

The Applicant has assessed the potential impacts of the proposal on flora and fauna in Section 6.4 of the EIS. Appendix G of the EIS provides a more detailed assessment and was conducted by HLA-Envirosciences' Ecology Unit.

The Applicant states that the abattoir and surrounds is largely cleared rural lands that have been extensively disturbed due to past and present landuse activities. Some remnant native trees are scattered across the site with formal landscaping on the western side of the abattoir complex comprising of largely exotic species such as *Cotoneaster glaucophyllus*, Oleander *Nerium oleander*, Willows *Salix* spp. and Tree of Heaven *Ailanthus altissima*.

The EIS indicates that no native fauna species were recorded or would be expected on the site, though domestic and feral species are present. The Applicant outlines that native bird species typical of semi-rural areas were observed in the area and that eighteen species listed in the schedules of the *Threatened Species Conservation Act 1995* (TSC Act) have been recorded in the vicinity. No threatened species, populations or ecological communities listed under the TSC Act were recorded on the site. Although a number of threatened species are known to occur in the locality, the majority are not considered likely to be present due to the site's highly disturbed nature and the lack of suitable habitat. Two threatened species, the Regent Honeyeater and the Squirrel Glider were considered potential inhabitants given the presence of a few remnant native trees scattered on the larger abattoir site. However, the Applicant suggested that as the proposal would be restricted to a cleared area and therefore none of these trees would require removal, the proposal is unlikely to significantly effect these species or their habitats.

### *Issues Raised in Submissions*

No public submissions raised issues regarding the flora and fauna impacts of the proposal.

The NPWS reviewed the EIS and accompanying Flora and Fauna Assessment report. The NPWS noted that due process was followed in assessing the likely impacts on flora and fauna, and concurred with the Applicant that the proposal would not significantly impact upon any native flora or fauna in the area. The NPWS also indicated support for the use of locally endemic species in landscaping works and that a landscaping plan be incorporated into the Construction Environmental Management Plan (CEMP).

### *Department's Position*

The Department reviewed both the EIS and accompanying Flora and Fauna Assessment Report. In general, the Department concurs with the findings of the report that the proposal is unlikely to have a significant impact on flora and fauna in general, or upon threatened species due to a lack of suitable habitat as well as current and historical landuse. Notwithstanding, the Department notes the listing of bird species recorded on site includes a *Neophema* sp. (grass parrot) and three species of this genus are listed as threatened species in the TSC Act. The Applicant considered the need to prepare an 8 part test for the Turquoise Parrot *Neophema pulchella* but considered this not necessary on the basis that the species had not been observed on site and that the proposed development would not have any impact on its habitat. No further assessment of species that have been observed in the vicinity was undertaken or an 8-part test prepared for the threatened species potentially present in the area. However, based on the habitat available at the site, the Department considers that if any threatened species are observed at the proposed site, it would unlikely be affected by the proposed development.

The Department recommends if consent is issued for the proposal, a condition requiring the use of locally native species in any landscaping works be included.

## **6.11 Social and Economic Impact Assessment**

### *Applicant's Position*

The Applicant assessed the social and economic aspects of the proposed development in section 6.12 of the EIS.

The EIS indicates that at full proposed production (ie 2,000 head per day over a seven day week), the abattoir would employ approximately 1,200 personnel. This equates to the generation of some 740 new full-time jobs as a result of the proposal. The Applicant notes that the total direct employment at the abattoir would represent some four percent of the of the entire Wagga Wagga workforce. Using an indirect employment multiplier of 1.5 for the total Wagga Wagga workforce, the EIS states that the total contribution of the Bomen Abattoir to the Wagga Wagga workforce is nearly six percent.

The Applicant outlines that the proposed expansion of the abattoir would help off-set the recent loss of jobs in the local Wagga Wagga manufacturing workforce which occurred due to the recent closure of a Laminex plant to the east of the Bomen Abattoir. It is also stated that the proposed expansion would help to arrest any decline in industrial investment in the area.

It is stated in the EIS that the expanded abattoir would provide a stimulus to local community services, however is not expected to impact on the capacity of these services, with the exception of the sewerage system. The expanded abattoir would constitute approximately 50 percent of the demand on the proposed new Bomen Industrial Sewage Treatment Facility, and as such CFA would contribute significantly to construction and operation of the facility (via wastewater disposal levies).

The Applicant does not expect that the proposal would have a significant effect on the existing community profile, structure or cohesion. The site is an existing abattoir that has been in operation for over 50 years. It is also stated that the proposal would not impact upon vehicular or pedestrian access patterns, and the level of security in the area is not expected to be affected.

The EIS notes that the proposed development is expected to provide a significant boost to the local and regional economies. It is also stated that there would be reduced site establishment and infrastructure costs as opposed to developing a new site and would ensure the ongoing feasibility of the Bomen Abattoir and its competitiveness in the meat processing marketplace.

The EIS states that the proposal is not anticipated to have a significant impact on property values or landuse in the local area provided the environmental controls detailed in the EIS are implemented and maintained. The EIS notes that former (undeveloped) residentially zoned land to the west of the abattoir site has recently been rezoned rural under the *Wagga Wagga LEP, 1985*. The Applicant considers that the rezoning is beneficial in terms of minimising any impact of the proposed development on sensitive landuses such as residential.

The applicant considers that with the adoption of the mitigation measures outlined in the EIS, any adverse social effects can be managed in accordance with the community's expectations. Consultation conducted for the proposal indicates that odour is the most significant issue to the community. The EIS also notes that with the employment of the

mitigation measures recommended in the EIS, odour modelling indicates that odour would decrease significantly from existing levels.

#### *Issues Raised in Submissions*

There were a couple of submissions from private individuals who raised concerns about the potential social impacts of the proposal. This included concerns relating to the potential impact of the proposal on property values, life-style, and health impacts.

The Department did not receive a request for the Minister to levy Section 94 contributions on behalf of Wagga Wagga City Council for the proposal.

#### *Proposed Mitigation Measures*

The EIS states that to ensure any social impacts are minimised, the Company would ensure that its complaints handling system is reviewed, and improved if necessary, prior to the commencement of construction works for the proposed development.

#### *Department's Position*

The Department acknowledges that should the abattoir proposal proceed, the project has the potential to impact on a range of socio-economic factors, particularly in the local area. The Department recognises the significant positive impact of the proposal to the Wagga Wagga Local Government Area, particularly the substantial employment opportunities through the creation of up to 740 new full time positions and the subsequent flow on effects for the local area.

However, the Department acknowledges that since the existing abattoir has been operating for over 50 years in the without stringent development consent controls, the operation of the abattoir may have been resulting in some level of social impact.

The Department considers that should the Minister grant development consent, the requirements of the recommended development consent conditions would provide a framework for the operation to meet strict environmental controls, requirements for reporting the performance of the operation and for monitoring. In general terms these measures would include requirements for the preparation of various environmental management plans to manage such issues as odour, noise and dust, procedures for handling and acting on any complaints such as odour and requirements for the preparation of an annual report review the performance of the site against its various conditions.

The Department considers that these measures should ensure that the potential social impacts are adequately mitigated.

### **6.12 Heritage Assessment**

#### *Applicant's Position*

Due to the disturbed nature of the proposed development site, the Applicant considered that an extensive archaeological assessment was not warranted for the proposal. As a result, the Applicant conducted a desktop assessment, including a review of previous investigations and searches of relevant local, State and Commonwealth heritage registers.

The EIS states that previous archaeological surveys have been undertaken on the site, including a survey for the proposed effluent irrigation areas in the southern area of the site. It was reported that, based on historical archaeological work in the region, sites which could be located in proximity to the abattoir site were 'scarred trees, isolated finds and open artefact scatters, probably of quartz and mound sites'. Field surveys of the proposed irrigation areas identified one isolated artefact – a piece of brown coarse grained silicate

found in the middle of a paddock on the proposed irrigation area on the O'Rourke property. It was concluded that due to the isolation of the artefact it was likely that it had been transported to its location from somewhere else.

The EIS indicates that as part of the desk assessment undertaken for the proposal, the following databases of identified indigenous and non-indigenous heritage items were searched:

- NSW National Parks and Wildlife Service Aboriginal Sites Register;
- Register of the National Estate;
- NSW Heritage Office State Heritage Inventory; and
- EPBC Act Database.

The EIS states that three isolated finds and one quarry listed on the NPWS Aboriginal Sites Register were identified in the vicinity of the Bomen Abattoir with one of the isolated finds being the artefact described above (identified as part of the application for the effluent irrigation areas). The other three are located in East Bomen approximately 1-2km east of the abattoir.

In relation to non-aboriginal heritage, the EIS indicates that none of the items identified by the Register of the National Estate are located on or within proximity to the proposed site. The only item identified on the State Heritage Inventory as near the abattoir site is the Bomen Railway Station which is situated approximately 500m to the north-east of the abattoir. The proposed development is not expected to have any direct impact on the Station. There are no World Heritage areas within proximity to the site.

#### *Proposed Mitigation Measures*

The EIS notes that the area of land that would be disturbed for the proposed development has been extensively disturbed by previous abattoir landuse activities and therefore the presence of any items of indigenous or non-indigenous heritage would likely have been lost or previously disturbed.

It is acknowledged in the EIS that although not anticipated, items of heritage significance could be encountered during site works. To ensure the appropriate management of any items uncovered in this potential situation, the EIS outlines the following mitigation measures would be incorporated into a Construction Environmental Management Plan for the project:

- Should any Aboriginal relics be encountered, works in the area must cease and the NPWS shall be notified.
- Should any European relics be encountered, the NSW Heritage Office and Wagga Wagga City Council's heritage representative shall be notified.

#### *Issues Raised in Submissions*

No public submissions raised issues regarding the heritage impacts of the proposal.

National Parks and Wildlife Service (NPWS) stated in its submission that it supported the findings of the EIS that the proposed development would not have any direct or in-direct impact on any items of indigenous heritage. However it recommended that construction work should cease and NPWS notified should any item of Aboriginal cultural significance be unearthed during construction.

#### *Department's Position*

The Department supports the mitigation strategies proposed by the EIS and the recommendation provided by the NPWS that work should cease and NPWS be notified in the event that an Aboriginal relic is unearthed during construction.

Should the Minister decide to grant development consent, the Department considers that the measures outlined in the EIS and a requirement for the Applicant to immediately cease works and notify the NPWS should any Aboriginal relics be uncovered during any construction activities, should be adopted. The Department considers that these measures would adequately address any potential impacts on any Aboriginal and non-Aboriginal archaeological and heritage items, and provide suitable protection.

### **6.13 Building Assessment**

The Department considers that the proposed development would require a Construction Certificate for the erection of the following buildings/structures:

- Administration Building – Class 5;
- Carpark – Class 7a;
- Cold Storage Building – Class 7b; and
- Boning Room, Active Chillers, Trimming Room, Packing and Load-out Facility, Sales Cooler, Plant Room, Kill Floor – Class 8

Conditions pertaining to building matters are included in the recommended instrument of consent. Condition 2.3 states that prior to construction and operation of the development, the Applicant shall certify that it has complied with all conditions of consent applicable prior to that event. The condition also refers to the staging of the submission of compliance certification consistent with the staging of activities. In addition, section 80A(11) of the Act refers to clause 133 of the Environmental Planning and Assessment Regulation (2000) which contains prescribed building conditions that are part of development consent.

### **6.14 Environmental Management**

The abattoir currently has an Environmental Management Plan in place, prepared in 1996, to deal with waste, irrigation, etc. However, to ensure that the proposed operations are carried out efficiently and effectively, the Applicant should be required to:

- Update the Environmental Management Plan for the abattoir's operations;
- Submit on an annual basis an Annual Environmental Management Report reporting the abattoir's environmental performance;
- Commission and pay the full cost of an independent environmental audit of the abattoir; and
- Submit a copy of the audit to the Director-General for review within two months of commissioning the audit.

## **7. SECTION 79C CONSIDERATION**

Section 79C of the Act sets out the matters that a consent authority must take into consideration when it determines a development application.

The Department has assessed the DA against these heads of consideration (see Appendix A), and is satisfied that the:

- The proposal is consistent with the relevant provisions in the *State Environmental Planning Policy (SEPP) No. 11 – Traffic Generating Development*, *SEPP No.33 – Hazardous and Offensive Development*, *Wagga Wagga Local Environmental Plan 1985*, and the *Wagga Wagga Development Control Plan (DCP) 1986*, *DCP No.2 – Road Traffic and Arterial Road Network Strategy*, *DCP No.3 – Flood Mitigation Strategy*, *DCP No.4 – Drainage Strategy* and *DCP No.5 – Sewer Strategy*;
- Proposal would not result in any significant environmental or socio-economic impacts;
- Site is suitable for the proposal development; and
- Development is likely to be in the public interest.

## **8. RECOMMENDED CONDITIONS OF CONSENT**

The recommended instrument of consent is attached (tagged "A"). The conditions take into consideration the General Terms of Approval and other issues raised by Government agencies, Council, and all other submitters including land owners, community groups and independent organisations.

The conditions of consent have been drafted with the aims of establishing a framework for implementing rigorous on-going compliance mechanisms, independent reviews and performance audits to mitigate the environmental impacts of the proposal to an appropriate and acceptable level. The recommended conditions of consent provide for appropriate monitoring of odour impacts, noise and dust, surface and groundwater management, effluent wastewater management, and for the Applicant to enter into a Trade Waste Agreement with the Council to ensure that effluent discharged from the site achieves discharge performance standards as set by the Council in a Trade Waste Agreement with the Company.

The Department has undertaken extensive consultations with the Applicant concerning the content and intent of the conditions of consent, and the Applicant accepts the conditions.

## **9. CONCLUSIONS**

The Department acknowledges that the previous operations of the Cargill Abattoir may have been generating some adverse impacts on the local community, particularly in relation to odour and waste management issues. However, the Department believes that the proposal represents a significant improvement to the abattoirs existing operations and should enhance its environmental performance.

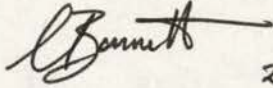
In addition, the Department considers that the recommended conditions of consent provide a rigorous and strict framework for the management, monitoring and reporting on the operation of the site. This includes requirements for the management of odour, noise and dust impacts, requirements for management of the proposed effluent disposal and for the undertaking of independent environmental auditing.

The Department is satisfied, through its environmental assessment of the proposal, that through the application of the consent conditions, which incorporate the General Term of Approval of the EPA, and recommendations of the DLWC, NPWS and Wagga Wagga City Council, the environmental impacts can be adequately managed. The proposal is also consistent with State and regional planning objectives, and with the local planning instruments.

## 10. RECOMMENDATIONS

It is recommended that the Minister:

- (a) Consider the findings and recommendations of this report (tagged "B");
- (b) Approve the DA subject to conditions, under Section 80 of the Act; and
- (c) Sign the attached Instrument of Consent (tagged "A").

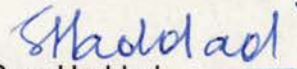


24/2/03

Caitlin Bennett  
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Endorsed:



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