

28 April 2022

**Department of Planning, Industry and Environment**  
 Locked Bag 5022  
 PARRAMATTA NSW 2144

Attention: Mr Jeffrey Peng

Dear Jeffrey,

**RE: RESPONSE TO COMMUNITY SUBMISSIONS DEVELOPMENT APPLICATION SSD - 13855453**

A response to matters raised by the community is provided in the Tables below. This response includes a detailed response to points raised by the nearest adjoining neighbour within Table 1. An aggregated response to the matters raised in the other submission is provided in Table 2.

**Table 1: Response to Susan McLelland (Nealon's Homestead)**

SUSAN MCLELLAND (NEALON'S HOMESTEAD)	
ISSUE	APPLICANT'S RESPONSE
<p>This submission is made on behalf of Kelly and Darren Nealon. Kelly and Darren Nealon are the owners of "Munjal" which is known as 1268 Gooloogong Road and adjoins the subject site along its northern boundary. The Nealon property includes Lot 1 in DP 241626 and Lot 2 in DP595663.</p> <p><b>1. Introduction</b>            The Nealon's homestead "Munjal", is located some 100 metres to the north of the common boundary (toward the Gooloogong Road frontage) and has been extensively renovated in recent years to accommodate their growing family and business. It includes landscape surrounds, infrastructure and large gardens on the eastern side of the dwelling. Their homestead is strategically located at the centre of their farming operation and accordingly has been developed as a foothold for their family business.</p> <p>The impacts of the proposed development, as it stands, to the Nealon family farm and home will be substantial. The homestead is orientated with expansive rural views to the east and south-east, approximately 1.7 km from Farm 4 and 1.5 kms from Farm 2 and will be located within 700 metres of the closest dirt road providing access to those farms.</p> <p><b>2. Visual Impact</b></p>	<p>Please see response to specific concerns raised below.</p>
	<p>To confirm the visibility of the proposed farms from the Munjal homestead, representatives from Baiada placed a</p>



**SUSAN MCLELLAND (NEALON'S HOMESTEAD)**

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<p>The visual impact of the Poultry Farm buildings and the access road will detract from the amenity of both the "Munjal" homestead and garden as well as from the visual amenity of the farm itself.</p> <p>The proposed Poultry Farm 4 is located approximately 1.7 kms east of the "Munjal" homestead and in direct line of sight from the dwelling and landscaped surrounds. The western elevation of the Farm Group 4 complex will be visible from the "Munjal" homestead and garden and the view will encompass the ends of 5 sheds (approx. 216 metres across), the egg packing room, an amenities building, silos, water tanks and 2 manager residences.</p> <p>Proposed Poultry Farm 2 is located approximately 1.5 kms south-east of the "Munjal" homestead, also highly visible from the dwelling and gardens. Both the northern elevation and the western elevation of the Farm 2 complex will be visible from the "Munjal" homestead and gardens and the view will encompass the end and side elevations of the shed group and will include the silos, the water tanks, the egg packing room and at least 1 of the 2 manager residences.</p> <p>In addition to the visual impact resultant from the Poultry Farms the access road located approximately 600 – 700 metres south-east from the "Munjal" homestead and garden will result in visually disruptive traffic and dust.</p> <p>The EIS does not include a detailed visual impact assessment and therefore the full extent of the visual impact is difficult to ascertain. As a minimum a visual impact assessment from the southern extent of "Munjal" and from the "Munjal" homestead and gardens would be beneficial to understand the extent of this impact.</p> <p>The visual impact of the proposed Poultry Farms is indicative of the inadequate site planning as well as the land area constraints of the site.</p>	<p>6m tall white post on each site with a solar light on top ensure the farms could be identified. The owners of Munjal were invited to review the farms sites from the homestead as well as travel on site and look back towards their residence from the farm locations.</p> <p>As confirmed during these activities:</p> <ul style="list-style-type: none"> <li>• Farm 1 was not visible due to intervening topography and existing vegetation.</li> <li>• Farm 4 was not visible due to intervening topography and existing row for trees to the west of the site.</li> <li>• Farm 2 will be visible from Munjal and as such a 3D Visualisation was prepared.</li> <li>• Farm 3 was very difficult to locate due to the intervening topography, existing vegetation and distance to the site.</li> </ul> <p>As outlined above, Farm 2 will be the most apparent farm from the Munjal Homestead and as such, 3D Environment were engaged to prepare realistic visualisation of the Farm 2 site from Munjal Homestead. At the request of the residents, the photos were taken from the edge of fenced area to avoid garden trees. These images are shown in Images 1 and 2 in <b>Attachment 1</b>.</p> <p>Farm 2 is setback approximately 1.5km from the Munjal Homestead and is visible from the property. Image 1 shows the proposed farm without the buffering vegetation proposed in the EIS. Image 2 show the impact on the proposed buffer vegetation and reduction in visibility of the proposed farm.</p> <p>This planting would consist of 3 rows of, endemic native trees (if these can be readily sourced) to create a visual buffer. An example of similar buffer between the road and a meat chicken (broiler) farm in Tamworth is shown below.</p>  <p>Details of the proposed buffer including species selection and planting can be provided prior to DPIE prior to issue of a construction certificate and can be conditioned accordingly.</p>

**SUSAN MCLELLAND (NEALON'S HOMESTEAD)**

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	<p>Additional 3d images have also been prepared for the project where the proposed farms are partially visible from public vantage points.</p> <p>As shown In Images 3 and Image 4, Farm 1 is momentarily visible for traffic travelling south on Gooloogong Road. Screening planting is proposed in between in front of Farm 1 site to limit visual intrusion. It is noted that as Gooloogong Road has a speed limit of 100km / hour, it is not expected to have significant impacts on the views from passing motorists.</p> <p>Similarly, Farms 2, 3, 4 (as shown in Images 5 and are mostly obscured by intervening topography and are setback a minimum of 1.4km from Gooloogong Road. Again this farm is not expected to result in significant impacts on the views from passing motorists.</p> <p>As noted in the submitted EIS, all planted screens are proposed in between all farms and potential public vantage points to minimise visual impacts even further.</p>
<p><b>3. Non-Compliance with the Weddin Local Environmental Plan 2011 (WLEP 2011)</b></p> <p>The proposal includes a total of 9 dwellings, including 8 managers dwellings and 1 existing dwelling. Within the provisions of the WLEP 2011 - Clause 4.1 the minimum lot size for a dwelling is 400 ha (approx. 1000 acres). The farm where the dwellings are located has an area of 598 hectares (1477 acres) and therefore the proposed 9 dwellings represent a non-compliance of 8 dwellings for the site. This non-compliance with result in considerable amenity impacts to the Nealon's property, "Munjla", including increased vehicle traffic resulting in reduced air quality and increased acoustic impact associated and the increased density proposed within a rural setting. The minimum lot size and density provisions within the WLEP have not been included within the EIS and the impacts of this a non-compliance have not been considered by the proposal.</p>	<p>The proposed managers' residences are ancillary and subordinate to the principal use which is intensive livestock agriculture. As the proposed operations involves livestock and animal welfare considerations, a farm manager or assistant manager is required to be on-site at all times.</p> <p>As described in the submitted EIS, the residences will be only occupied by the on-site managers and cannot be leased out or sold to third parties. The potential impacts associated with the managers' residences have been considered as part of the technical studies submitted with the EIS (e.g. Traffic Impact Assessment).</p> <p>If treated as a separate use, the manager's residences would more neatly fall under the LEP definition of a Rural Workers Dwelling which is defined as <i>"a building or place that is additional to a dwelling house on the same lot and that is used predominately as a place of residence by persons employed, whether on a long-term or short-term basis, for the purpose of agriculture or a rural industry on that land."</i></p> <p>In this regard, the WLEP 2011 Clause 4c allows for Rural Workers Dwellings within the RU1 Zone where:</p> <ul style="list-style-type: none"> <li>• <i>the development will not impair the use of the land for agricultural or rural industries, and</i></li> <li>• <i>there is a demonstrated economic capacity of the agricultural or rural industry being carried out on the land to support the ongoing employment of rural workers, and</i></li> <li>• <i>the development will be on the same lot as an existing lawfully erected dwelling house, and</i></li> <li>• <i>the development is necessary considering the nature of the agricultural or rural industry land use</i></li> </ul>

**SUSAN MCLELLAND (NEALON'S HOMESTEAD)**

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	<p align="center"><i>lawfully occurring on the land or as a result of the remote or isolated location of the land.</i></p> <p>With consideration of the requirements above, the proposed managers' residences are integral to and necessary for the operation of the proposed intensive livestock agriculture (which is a type of agriculture), and will not impair the use of the site or surrounding properties for agricultural or rural industry activity. As such, the proposed managers' residences broadly align with the intent document in the WLEP 2011 for rural workers dwellings.</p>
<p><b>4. Non-Compliance with the Weddin Shire Development Control Plan 2014 (WDCP)</b>                      The proposed development does not comply with Chapter 9 – Rural Development of the WDCP. In particular, the clause pertaining to Rural Land Use Conflict which aims to <i>“minimise the opportunities for rural land use conflicts”</i> and to provide landscaped setback distances of no less than 150 metres between incompatible land uses. Although the setback distances are not shown on the site plan, Farm Group 4 is located a short distance to the northern site boundary which is common to “Munjäl”. In addition, the proposed intensive agricultural operation represents a conflict between the rural character and broad acre farming practices at “Munjäl”.</p> <p>The proposal does not comply with Chapter 9 of the WDCP in relation to Scenic and Landscape Quality. The proposal does not satisfy the objective of the control being <i>“to minimise the impact of development on upon the rural landscape”</i>. The scale and intensity of the proposed intensive poultry farm is not compatible with the surrounding rural landscape which is characterised by family run broadacre cropping and livestock operations.</p>	<p>The location of each of the farms on site has been carefully based on consideration of a number of factors including bio-security and potential land use conflicts.</p> <p>As a result of the strict bio-security protocols adopted by each farm and the overall site, the surrounding land uses, and the fact that the birds are wholly contained within the sheds at all times, the minimum 50m setback from the sheds to the boundary is sufficient to manage bio-security risks.</p> <p>The proposed breeder and rearing farms will not introduce a conflict with or place any limitations on the continuation of agricultural and other rural activities occurring on any adjoining properties.</p> <p>With respect to scenic amenity considerations, please refer to the comments for Point 2 above.</p>
<p><b>5. Air Quality and Acoustic Impacts</b>                      The proposal will result in a loss of acoustic privacy to “Munjäl” resulting from the proximity of the access road to the south-east and the increased light and heavy vehicle movements around the site (approx. 56 vehicle movements per day). In addition, the movement of birds between farms on a regular basis at night, the continuous mechanical ventilation to the sheds and other plant and equipment noise will result in increased acoustic impact to what is currently a quiet rural setting.</p> <p>The proposal will also result in a loss of air quality to the Nealon's at their homestead and garden and on their farm generally. The</p>	<p><b>Air Quality (Odour and Dust)</b></p> <p>An Odour and Dust Assessment was prepared by Astute Environmental was undertaken and submitted as Appendix 9 of the EIS. This assessment showed that the highest predicted concentration of odour is 3.9 odour units (ou) at the Nealon's Residence – which is also the nearest sensitive receptor. Whilst this is the highest ou predicted at any sensitive receptors, it is well below the conservative 5 ou criterion adopted for the project.</p> <p>With respect to dust, the assessment demonstrates that no additional exceedances of the 24 hour PM<sub>10</sub> are predicted to occur at any of the sensitive receptors as a result of the proposed development.</p>

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<p>Nealon's have experience of the dust generated by heavy vehicles as they utilise heavy vehicles during harvest on a much smaller scale.</p> <p>During harvest even the smaller number of heavy vehicles can generate excessive dust which compromises air quality (especially in dry years).</p>	<p>As such, the Odour and Dust Assessment shows compliance with the applicable assessment criteria for the project.</p> <p>Regardless of this demonstrated compliance, additional management and mitigation measures are proposed in section 6 of the Odour and Dust Assessment. These requirements will be adopted by the Applicant and are included within the proposed management and mitigation measures for the project.</p> <p><b>Noise</b></p> <p>The noise report undertaken for the project shows that both during the construction and operation phase of the project will be compliant with the relevant criteria with the exception of <i>"a minor 2dB(A) exceedance predicted at residence R1 (the Nealon residence) during adverse weather conditions. The above calculations assume all ventilation fans, truck movements and the emergency generator are operating simultaneously at the nearest Farm 2. In reality, all items and activities will not occur at the same time, implying compliance."</i></p> <p>Whilst the report does not consider that acoustic modifications are required, it does note that in the event of demonstrated non-compliance, a landscaped earthen mound (1.5 – 1.8m) could be constructed along the western side of Farm 2 which would mitigate unacceptable noise emissions.</p> <p>In the unlikely event of demonstrated non-compliance, consideration will be given at that time to noise mitigation measures which include a landscaped earthen mound (1.5 – 1.8m) that could be constructed along the western side of Farm 2.</p>
<p><b>Conclusion</b></p> <p>The proposed impacts and the considerable non-compliances associated with this intensive livestock proposal point to the fact that the site area does not support the scale and intensity of the proposed use. The small land area relative to the scale of the development means that adequate setbacks to neighbouring properties cannot be achieved and accordingly the impacts of the proposal will unreasonably detract from the amenity of its closest neighbours at "Munjaj".</p>	<p>The subject site has been carefully chosen as it satisfies the specific locational requirements for the development of a new breeder / rearer farm. These include:</p> <ul style="list-style-type: none"> <li>• Access to water.</li> <li>• Access to grain supplies.</li> <li>• Sufficiently sized to provide the required separation distances between farms and other sensitive receptors.</li> <li>• Proximity to other facilities within Baiada's poultry supply chain including both the Griffith and Tamworth production areas.</li> </ul> <p>Within the site, the location of each of the farms is also based on the careful consideration of a number of factors including:</p> <ul style="list-style-type: none"> <li>• Physical constraints including topography, geology, flooding, stormwater flows, and other natural hazards.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Constructability including minimisation of earthworks.</li> <li>• Bushfire risk and maintenance of asset protection areas.</li> <li>• Minimising impact on significant flora or fauna.</li> <li>• Minimising impacts on cultural heritage.</li> <li>• Biosecurity including a minimum separation of 500m between farms and 50m to the site boundaries.</li> <li>• Infrastructure and servicing provisions necessary for operation.</li> <li>• Separation distances to sensitive receptors to ensure no unacceptable amenity impacts including odour, dust and noise.</li> </ul> <p>As demonstrated within the submitted EIS, the site exhibits all these characteristics and will comply with the applicable standards with respect to potential impacts. As such, the site is considered suitable and able to accommodate the development.</p> <p>The Applicant is committed to being a good neighbour and the development and operations of the proposed farm will be undertaken in a manner which minimises potential amenity impacts to all neighbours.</p>

**Table 2: Response to the Issues Raised in Public Submissions**

MATTERS RAISED	APPLICANT’S RESPONSE
<b>FARM OPERATIONS</b>	
<ul style="list-style-type: none"> <li>- The sheer number of animals in one area. 750,000! Way too many.</li> </ul>	<p>The subject site has been carefully chosen as it satisfies the specific locational requirements for the development of a new breeder / rearer farm. These include:</p> <ul style="list-style-type: none"> <li>• Access to water.</li> <li>• Access to grain supplies.</li> <li>• Sufficiently sized to provide the required separation distances between farms and other sensitive receptors.</li> <li>• Proximity to other facilities within Baiada’s poultry supply chain including both the Griffith and Tamworth production areas.</li> </ul> <p>Within the site, the location of each of the farms is also based on the careful consideration of a number of factors including:</p> <ul style="list-style-type: none"> <li>• Physical constraints including topography, geology, flooding, stormwater flows, and other natural hazards.</li> <li>• Constructability including minimisation of earthworks.</li> <li>• Bushfire risk and maintenance of asset protection areas.</li> <li>• Minimising impact on significant flora or fauna.</li> <li>• Minimising impacts on cultural heritage.</li> <li>• Biosecurity including a minimum separation of 500m between farms and 50m to the site boundaries.</li> <li>• Infrastructure and servicing provisions necessary for operation.</li> <li>• Separation distances to sensitive receptors to ensure no unacceptable amenity impacts including odour, dust and noise.</li> </ul> <p>As demonstrated within the Submitted EIS, the site exhibits all these characteristics and will comply with the applicable standards with respect to potential impacts. As such, the site is considered suitable and able to accommodate the maximum population of 570,000 birds.</p>
<b>WATER USE</b>	
<ul style="list-style-type: none"> <li>- Water security for people already living in the area. Is there going to be enough water for the for them if it has to now be shared with 750,000 animals?</li> <li>- This project would use large quantities of water</li> </ul>	<p>The 1ML per day referenced in the submitted EIS represents a worst case scenario which would be a very hot summer day combined with peak bird numbers. During such an event water required for evaporative cooling of the sheds and bird drinking water would at the maximum. For a majority of the year, water</p>

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<ul style="list-style-type: none"> <li>- The proposed development would require 1 million litres of water per day from the Gooloogong-Grenfell Water Pipeline. Water scarcity is persistent issue in Australia, and like all forms of animal agriculture, poultry farming is a thirsty industry. Chicken flesh requires over 1.5 times more water per gram of protein than pulses to produce, according to the Water Footprint Network. Planning to expand such operations in an area so susceptible to droughts is senseless. Water is essential to life – eating chicken is not.</li> <li>- The proposal is set to require huge amounts of water, in the region of 1 million litres of water per day from the Gooloogong-Grenfell pipeline. Water security is a significant issue for the Catchment Management Authority to preserve the water supply to local towns. The diversion of this much water is not a sustainable management of a critical resource.</li> <li>- That the expected water usage of 1 million litres will have a material or significant impact upon water supply for Grenfell and its surrounds, particularly with forecasts for decreased rainfall in the years ahead due to climate change.</li> <li>- The requirement of 1 million litres of water a day.</li> </ul>	<p>for shed cooling is not required and bird drinking water is much less.</p> <p>Based on data from a similar sized sheds operating in Tamworth, the total annual water demand for the project is anticipated to be in the order of 141 ML per year.</p> <p>A Breakdown in annual demand is shown in the following table.</p> <table border="1" data-bbox="756 528 1351 967"> <thead> <tr> <th>ACTIVITY</th> <th>ML / year</th> </tr> </thead> <tbody> <tr> <td>Bird Drinking</td> <td>65.8</td> </tr> <tr> <td>Shed Cooling</td> <td>65.8</td> </tr> <tr> <td>Manager Residences &amp; Staff Amenities</td> <td>5.1</td> </tr> <tr> <td>Shed Cleaning</td> <td>0.2</td> </tr> <tr> <td>Landscaping / Tree Planting</td> <td>4.0</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>140.9</b></td> </tr> </tbody> </table> <p>Central Tablelands Water have confirmed in their correspondence dated 3 March 2022 that this annual supply of water will be available during periods up to and including Level 6 Restrictions.</p>	ACTIVITY	ML / year	Bird Drinking	65.8	Shed Cooling	65.8	Manager Residences & Staff Amenities	5.1	Shed Cleaning	0.2	Landscaping / Tree Planting	4.0	<b>TOTAL</b>	<b>140.9</b>
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<p><b>ODOUR AND DUST</b></p> <ul style="list-style-type: none"> <li>- Ammonia gas – commonly emitted from poultry farms – has a sharp and pungent odour and can act as an irritant when present in elevated concentrations, as it would be around a facility housing 570,000 birds. Ammonia can cause breathing issues and exacerbate some people’s asthmas as well as irritate eyes for the local community or indeed the workers.</li> <li>- Pungent odours caused by ammonia gas</li> <li>- This number of animals will also generate a huge amount of pollution.</li> </ul>	<p>Ammonia can be produced by poultry farms and has already been factored into the odour modelling and subsequent Air Quality Impact Assessment submitted as part of the EIS.</p> <p>With modern management practices (such as good litter maintenance, efficient drinking systems and effective fogging systems), ventilation and shed design, the ammonia concentrations from modern poultry farms remain low. It is also critical for animal welfare and husbandry reasons to maintain this level.</p> <p>The Air Quality Impact Assessment states:</p> <p><i>“...it is important to note the differences between Breeder and Meat Chicken (broiler) farms. A survey by Geordie Galvin of Queensland Councils that regulated poultry farms in the early 2000s (DPI&amp;F, Unpublished) highlighted that odour complaints from poultry farms were always associated with broiler farms rather than breeder farms. This, along with anecdotal evidence regarding the distance between existing breeder farms and receptors shows that breeder farms (including</i></p>														

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	<p><i>rearer farms) have a much lower risk of odour complaints than meat chicken farms."</i></p> <p>The farm will operate in accordance with the <i>Best Practice Management for Meat Chicken Production in NSW</i> Guidelines. These guidelines state:</p> <p><i>"Ammonia levels in sheds are controlled (for both bird and human health) by ensuring that they are consistently below levels that can be detected by smell (10 to 15 ppm). If ammonia reaches levels that cause irritation to humans (&gt;25 ppm), immediate action must be taken to reduce levels by reducing litter moisture content and/or increasing ventilation</i></p> <p><i>When ventilation is used to remove ammonia from the shed, temperature and humidity must be maintained to a standard appropriate to the age of the birds."</i></p> <p>In this regard, the sheds will be connected to an internal alarm system that will alert the staff/on-site managers to any issues relating to ventilation and/or ammonia levels. Should this circumstance arise, it can be dealt with promptly.</p>
<ul style="list-style-type: none"> <li>- The substantial dust, odour and other forms of air pollution that would be generated by a project expected to house up to 570,000 chickens, and my concerns that this is not properly addressed by the DA.</li> </ul>	<p>An Odour and Dust Assessment was prepared by Astute Environmental was undertaken and submitted as Appendix 9 of the EIS. This assessment showed that the highest predicted concentration of odour is 3.9 odour units (ou) at the nearest sensitive receptor. Whilst this is the highest of all nearby sensitive receptors, it is below adopted 5 ou criterion which is conservative given the small number of nearby residences.</p> <p>With respect to dust, the assessment demonstrates that no additional exceedances of the 24 hour PM<sub>10</sub> are predicted to occur at any of the sensitive receptors as a result of the proposed development.</p> <p>As such, the Odour and Dust Assessment shows compliance with the appropriate assessment criteria.</p> <p>Regardless of demonstrated compliance, additional management and mitigation measures are proposed in section 6 of the Odour and Dust Assessment. These requirements have been replicated in the management and mitigation measures proposed for the project.</p>
<b>BIOSECURITY AND DISEASE</b>	
<ul style="list-style-type: none"> <li>- This number of animals together raises concerns about zoonotic disease outbreaks.</li> <li>- Constructing more intensive poultry sheds while Australia continues to grapple with COVID-19 would be irresponsible. Much like COVID-19, bird flu is a zoonotic disease, and the Australia poultry industry has experienced several outbreaks of it – one as recently as 2020. According to the US Centers for Disease Control and</li> </ul>	<p>As outlined above, the relevant codes of practice which will be applied to the farm include the National Farm Biosecurity Manual (<b>NFBM</b>) and Guidelines issued by DAFF, The NFBM for Chicken Growers issued by Australian Chicken Meat Federation (<b>ACMF</b>), Baiada's own Biosecurity Manual and Baiada's National Livestock Animal Welfare and Biosecurity Manual, the relevant breed guidelines "Breeder Management Guide", as well as all legal requirements governing animal welfare and biosecurity including:</p>

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<p>Prevention, approximately 75% of recently emerged infectious diseases affecting humans began as diseases in animal. Such an outbreak would affect not only the human population but also local native bird populations. Baiada's waste management plan does not deal properly with this eventuality, other than to say that diseased birds would be removed for processing, rendering or disposal. The report fails to specify which slaughterhouse and authorised landfill birds would be taken to in this event or how their transport would be managed in order to stop the spread of disease. In the event of such an outbreak, more than half a million birds would need to be killed and disposed of – a matter that needs more serious consideration. The NSW government should be stopping this proposed based on this issue alone. Look at what is happening in NSW now with the COVID pandemic and a mutated form of the virus – omicron. This is a terrible reckless proposal simply based on our health.</p> <p>- The cramming together of thousands of birds into an unnaturally small space draws the risk of disease outbreak such as the Avian Influenza Virus. The consequences for the local bird species are grim but the inevitable slaughtering of 570,000 birds draws the question of the disposal of the bodies without risk to the environment or people. This has clearly not been considered adequately. The risk of spread of such a zoonosis is well documented and given the current pandemic is a grossly under-considered issue.</p>	<ul style="list-style-type: none"> <li>• <i>The Prevention of Cruelty to Animals Regulation 2012</i></li> <li>• <i>The Prevention of Cruelty to Animals (Land Transport of Livestock) Standards 2013</i></li> <li>• <i>Model Code of Practice: Domestic Poultry</i></li> <li>• <i>National Water Biosecurity Manual – DAFF</i></li> <li>• <i>National Animal Welfare Standards - ACMF</i></li> <li>• <i>Land Transport of Poultry – Model Code of Practice for the Welfare of Animals</i></li> </ul> <p>In accordance with the above requirements, Baiada undertakes a site specific risk assessment for each specific farm site identifying vectors and agents of infectious disease incorporating:</p> <ol style="list-style-type: none"> <li>a. Moving poultry between sites</li> <li>b. Dead bird management</li> <li>c. Wild birds, vermin, stock</li> <li>d. People</li> <li>e. Equipment</li> <li>f. Vehicles</li> <li>g. Air (air borne pathogens)</li> <li>h. Water supply (quality and security)</li> <li>i. Feed</li> </ol> <p>Quarantine rules are then put in place regarding:</p> <ol style="list-style-type: none"> <li>a. Physical segregation of the production area from the general farm area</li> <li>b. Restricted access to the production area of people, equipment, domestic stock, wild birds and vermin</li> <li>c. Hierarchy of visitation – for example 24hr, 48hr, 72hr, weekly stand downs between sites</li> <li>d. Shower in and change of clothes for staff</li> <li>e. Sanitation of vehicles and equipment entering production area</li> </ol> <p>Additional controls that are identified from the risk assessment are also put in place including:</p> <ol style="list-style-type: none"> <li>a. Staff trained in risks, controls and consequences</li> <li>b. Minimum Facility standards in place for: <ol style="list-style-type: none"> <li>1. Physical controls and barriers <ol style="list-style-type: none"> <li>a. Dead bird freezers provided and maintained away from the production areas</li> <li>b. Exclusion of wild birds, vermin (rodent control), other stock and predators</li> <li>c. People, showers, hand wash basins, foot baths, laundered clothes on site</li> <li>d. Wheel washes for vehicles and equipment coming into the production area</li> <li>e. Water sanitation</li> </ol> </li> </ol> </li> </ol>

MATTERS RAISED	APPLICANT'S RESPONSE
	<p>f. Closed feed supply system</p> <p>g. Full clean out and disinfection of all sheds between batches – all in, all out system applied</p> <p>c. Monitoring and notification</p> <p>d. Auditing to confirm adherence to the required standards</p> <p>With respect to bird health, a vaccination and health maintenance program is put in place, which is overseen by the company veterinarians. A routine health monitoring program is also put in place, which is again determined by company veterinarians.</p> <p>The treatment and disposal options for waste streams including mortalities was identified in the EIS. With respect to general mortalities and egg waste, these are collected from the sheds on a daily basis and stored in freezers on-site for collection. The mortalities will be taken to the company rendering plant either to Griffith or Tamworth for rendering while egg waste can be taken to various composting facilities in the Riverina.</p> <p>In the event of a large mortality event, Baiada will implement its mass mortality protocols. In the unlikely event of a notifiable disease outbreak on any of the farms, the Department of Primary Industry (DPI) will be contacted as soon as the outbreak is suspected. In most instances, the DPI will assume control of the site and order appropriate management actions to be undertaken.</p> <p>Existing transport and collection contractors have the capacity to remove large volumes of birds carcasses from site at short notice.</p> <p>In the event that rendering of the birds is not possible or not supported by the DPI, Baiada has an existing legal agreement with an EPA Licensed composting facility in the Riverina to take up to 5,000T per annum of mortalities. This would have the capacity to take up all birds from the Grenfell Farm if required.</p> <p>There are also generic procedures for composting litter on a site if there is a direction from the DPI that material cannot leave the site due to a disease outbreak. Should an exclusion zone exist and mortalities and litter be unable to be moved, disposal will be as directed by the relevant authorities.</p> <p>Should this occur, Baiada is aware of a portable composting business that can be imported to the site which has the capacity to process both carcasses and litter at reasonably short notice.</p>
<b>ANIMAL WELFARE</b>	
<ul style="list-style-type: none"> <li>- Animal welfare is a major concern with this number of animals in close quarters.</li> <li>- This same company's previous poultry operations involved disgusting abuse of chickens such that this company should</li> </ul>	<p>Baiada is fully committed to its animal welfare and biosecurity policies, which have been endorsed at the highest level by the Managing Director. These contain not only moral and ethical obligations, but also recognised that for any animal husbandry enterprise to be viable,</p>

MATTERS RAISED	APPLICANT'S RESPONSE
<p>never be allowed to operate again. It cannot be trusted to run any facility involving animals.</p> <ul style="list-style-type: none"> <li>- Chickens are intelligent, social animals, who feel pain and distress. In 2019, a PETA expose of Baiada – the proponent of the Grenfell proposed – found widespread cruelty in its breeding facility and abattoir.</li> <li>- We have just completed a submission paper for improved Animal Welfare Reforms in NSW which also includes factory farming. The government is attempting to initiate improved animal welfare outcomes in our state. For the government to accept this proposed knowing that Baiada – the proponent of the Grenfell proposal has been responsible for animal cruelty in the past would be sending the wrong message to the community. It would be a backward step in animal reforms. Say no to this proposed, otherwise you are supporting and condoning animal cruelty in our state.</li> <li>- A trail of poor publicity has followed this company. It was taken to court in 2013 by the ACCC for misleading the public on packaging and advertising. In 2016 the company was found guilty of wage fraud. In 2019 a video of savage cruelty towards chickens revealed the smashing of birds against metal railings, punching them in the head and repeatedly tearing birds' heads off by Baiada workers.</li> <li>- A company of this type is not interested in anything other than profit, will have no interest in the environment surrounding Grenfell, and will have no care for the birds which it will farm in monstrous proportions.</li> <li>- This proposed development cannot be acceptable to an area which prides itself on preservation of natural heritage and maintenance of sustainable and thoughtful industry.</li> <li>- I have significant concerns as to whether high and rigorous welfare standards can in fact be maintained for so many birds, with serious questions about the conditions in which broiler chickens are raised based on the science.</li> <li>- Chickens are sentient feeling creatures and Baiada have been reported to severely abuse birds, punching them, crushing their necks, bashing them against</li> </ul>	<p>those animals require optimum care and management, as well as provision of the very best housing and equipment available on the market. This is indeed what the Grenfell development will provide. This infrastructure will be supported by skilled and experienced husbandry managers, trained staff, optimum diets formulated by specialised poultry nutritionists, health monitoring by qualified veterinarians and service personnel as well as technical support from subject matter experts to ensure all legal, ethical and company requirements are met.</p> <p>As Baiada operates across 5 States within Australia, all systems that assist managers to control animal welfare and biosecurity risks are applied on a national basis. There is an extensive management system in place that is designed to meet legal and husbandry requirements which ensures a consistent application of standards throughout the Livestock sector of the business. These management practices not only meet the Codes of Practice, Acts and Regulations and Guidelines, but strive to meet what is considered to be Best Practice in the industry.</p> <p>Specifically, the company's animal welfare systems consists of the following components:</p> <ol style="list-style-type: none"> <li>1. Animal Welfare Policy</li> <li>2. Animal Welfare Standards <ul style="list-style-type: none"> <li>▶ Third party reviewed 2020</li> <li>▶ Commenced third party auditing 2021</li> </ul> </li> <li>3. KPI trending &amp; benchmarking</li> <li>4. Incident reporting system <ul style="list-style-type: none"> <li>▶ Including a 'See Something, Say Something' hotline</li> <li>▶ Incident response investigation and management process</li> </ul> </li> <li>5. Induction &amp; training systems</li> </ol> <p>These systems are supported by:</p> <ul style="list-style-type: none"> <li>▶ Animal welfare culture surveys</li> <li>▶ Trial of the 'Revelian' pre-employment screening tool when engaging new staff</li> <li>▶ Diversity targets for livestock staff</li> <li>▶ 'Every Chicken Counts' training and awareness program</li> <li>▶ Animal Welfare Officer (AWO) training</li> <li>▶ Animal welfare induction video</li> <li>▶ Animal welfare officers will be trained and appointed one per farm at Grenfell as per Baiada standards</li> <li>▶ Portable CCTV to monitor catching activities</li> </ul>

MATTERS RAISED	APPLICANT'S RESPONSE
<p>metal railings. The chickens are treated in a highly inhumane indecent manner. There are reports of tearing off their heads as though it was a sick joke and wearing it as a finger puppet. This is disgraceful and such cruelty and disregard for these animals should not be tolerated.</p> <ul style="list-style-type: none"> <li>- Concerns raised by Animal Welfare Groups regarding Poultry Production.</li> </ul>	
VISUAL IMPACTS	
<ul style="list-style-type: none"> <li>- Issues concerning visual impact were raised by one nearby landholder during consultation. While a landscape buffer has been proposed to help mitigate this visual impact for the neighbour, such a buffer would take time to mature and grow large enough to conceal the huge structure, as the tallest silos would be 7.6 metres.</li> <li>- The visual impact of 40 sheds is entirely out of keeping with the beauty of the area and would diminish the value of its natural heritage and biodiversity which we should be endeavouring to maintain and improve. This proposal would entirely undermine a goal for attractive and sustainable development.</li> <li>- Visual impact to the landscape</li> </ul>	<p>To confirm the visibility of the proposed farms from the Munjal homestead and other public vantage points, representatives from Baiada placed a 6m tall white post on each site with a solar light on top ensure the farms could be identified. The owners of Munjal were invited to review the farms sites from the homestead as well as travel on site and look back towards their residence from the farm locations.</p> <p>As confirmed during these activities:</p> <ul style="list-style-type: none"> <li>• Farm 1 was not visible due to intervening topography and existing vegetation.</li> <li>• Farm 4 was not visible due to intervening topography and existing row for trees to the west of the site.</li> <li>• Farm 2 will be visible from Munjal and as such 3D Visualisation was prepared.</li> <li>• Farm 3 was very difficult to locate due to the intervening topography, existing vegetation and distance to the site.</li> </ul> <p>As outlined above, Farm 2 will be the most apparent farm from the Munjal Homestead and as such, 3D Environment were engaged to prepare realistic visualisation of the Farm 2 site from Munjal Homestead. At the request of the residence, the photos were taken from the edge of fenced area to avoid garden trees. This imaged are shown in Images 1 and 2 in <b>Attachment 1</b>.</p> <p>Farm 2 is setback approximately 1.5km from the Munjal Homestead and is visible from the property. Image 1 shows the proposed farm without the buffering vegetation proposed in the EIS. Image 2 show the impact on the proposed buffer vegetation and reduction in visibility of the proposed farm.</p> <p>This planting would consist of 3 rows of, endemic native trees (if these can be readily sourced) to create a visual buffer. An example of similar buffer between the road and a meat chicken (broiler) farm in Tamworth is shown below.</p>

MATTERS RAISED	APPLICANT'S RESPONSE
	 <p>Details of the proposed buffer including species selection and planting can be provided prior to DPIE prior to issue of a construction certificate and can be conditioned accordingly.</p> <p>Additional 3D images have also been prepared for the project where the proposed farms are partially visible from public vantage points.</p> <p>As shown In Images 3 and Image 4, Farm 1 is momentarily visible for traffic travelling south on Gooloogong Road. Screening planting is proposed in between in front of Farm 1 site to limit visual intrusion. It is noted that as Gooloogong Road has a speed limit of 100km / hour, it is not expected to have significant impacts on the views from passing motorists.</p> <p>Similarly, Farms 2, 3, 4 (as shown in Images 5 and are mostly obscured by intervening topography and are setback a minimum of 1.4km from Gooloogong Road. Again this farm is not expected to result in significant impacts on the views from passing motorists.</p> <p>As noted in the submitted EIS, all planted screens are proposed in between all farms and potential public vantage points to minimise visual impacts even further.</p>
<b>ECOLOGY</b>	
<ul style="list-style-type: none"> <li>- If these plans went ahead, approximately 1.17 hectares of box gum grassy woodland would be cleared, comprising 0.09 hectares of woodland and 1.08 hectares of native grassland. A further 0.21 hectares of fuzzy box woodland would also be removed. The clearing of these areas is considered to have “serious and irreversible impacts”. The direct impact of the development would be a total loss of 1.42 hectares of native vegetation. This native vegetation is vital for habitat for woodland birds, many of this are endangered in NSW. Damaging habitats affects vital ecosystems which we must protect to save species.</li> <li>- The project will cause the destruction of surrounding flora and fauna.</li> </ul>	<p>A Biodiversity Development Assessment Report (BDAR) has been prepared by prepared as part of the Environmental Impact Statement, field work was undertaken by accredited and experienced ecologists. The impact of the development was then assessed against the relevant Federal and State ecology assessment.</p> <p>In order to minimise impacts, the poultry farms are primarily located on historically cleared, pasture land, which has been used for agricultural purposes for several years. The majority of the land within the study area is heavily modified pastureland that has been assessed as confirming to the definition of Category 1 – Exempt Land. Impact on the riparian vegetation along Wallah Wallah Creek was also minimised by locating the access road over the existing track.</p> <p>As noted, the extent of impact is limited to 0.09 hectares of woodland and 1.08 hectares of native grassland. Where there has been an impact to native</p>

MATTERS RAISED	APPLICANT'S RESPONSE
<ul style="list-style-type: none"> <li>- The proposed site is set within the south-west slopes Key Biodiversity Area for Birds and attracts regular biodiversity surveys. It is rich with birdlife and native plants. The location is also within the Cowra Woodlands area which has been the site of the Cowra Woodlands Bird Program devoted to the management of birds in their woodland habitats. This program has been running for 15 years to encourage the preservation of local native birds in critically endangered Box Gum woodland habitat. A significant amount of tourism is drawn to the area because of the richness of native birdlife locally. They are drawn to bird trails which surround the area where the development is proposed to be located. Moreover, many species are threatened and are declining due to the clearance of lowland grassy woodlands, which also contain many threatened plants.</li> <li>- The proposal is completely unacceptable for an area which is renowned for its natural heritage and has a clean and green image.</li> </ul>	<p>vegetation, offsets (24 credits) will be paid in accordance with the Biodiversity Offsets Scheme.</p> <p>With respect to threatened species, the Biodiversity Assessment Method calculator (BAMC) generated a list of potential threatened species requiring assessment which included 34 ecosystem credit species and 3 species credit species. With consideration of habitat constraints, geographic limitations, vagrancy and quality of microhabitats, all ecosystem species were retained within the assessment. No further assessment was required for the species credit species as the study areas do not contain important habitat or breeding areas.</p> <p>It is noted that the Biodiversity, Conservation and Science Directorate of the Department of Planning and Environment has reviewed the BDAR prepared as part of the Environmental Impact Statement and has provided a response which states:</p>
<p><u>Clearing native vegetation</u></p>	
<ul style="list-style-type: none"> <li>- Box Gum woodlands are critically endangered ecosystems which are remnant habitats for threatened species. Clearing of this type is no longer acceptable as it is not 'maintaining and enhancing the natural resource base', as stated within the Weddin Local Environmental Plan 20118. Clearing of any area of native vegetation, including areas less than 2 hectares in extent, may have significant impacts on biological diversity.</li> <li>- The clearing of local vegetation including woodland, derived native grassland and exotic grassland, for the project. I understand that the EIS identifies a number of threatened species within the project land. The vulnerable, threatened and even critically threatened state of woodland communities in NSW, and numerous species living within it (such as woodland birds), is notorious and well established on scientific evidence.</li> <li>- The clearing of vegetation considered to have serious and irreversible impacts.</li> </ul>	<p><i>"BCS is satisfied that the BDAR adequately assesses the impacts of the development to biodiversity in accordance with the Biodiversity Assessment Method (BAM), noting a requirement to retire 24 ecosystem credits prior to commencement of work impacting on biodiversity values.</i></p> <p><i>BCS recommend that the requirement to retire the 24 ecosystem credits in accordance with s7.14(4) of the Biodiversity Conservation Act 2016 be included in the project consent conditions, should the project be approved."</i></p>

MATTERS RAISED	APPLICANT'S RESPONSE
<b>WATERWAYS</b>	
<p>- The waterways and aquifers of the Lachlan catchment are important water resources for agriculture, mining, tourism and towns. They also support threatened and iconic species such as: purple spotted gudgeon, silver perch, Murray cod, Macquarie perch, trout cod, southern pygmy perch, flathead galaxias, freshwater catfish and olive perchlet, glossy ibis, blue-billed ducks, freckled ducks, straw-necked ibis, Australasian bittern and the largest, regularly used breeding colony of pelicans in NSW. There are eight wetlands in the Lachlan catchment that are listed in the Directory of Important Wetlands in Australia, including the Booligal Wetlands, Lachlan Swamp and Great Cumbung Swamp (Department of Environment and Energy 2018). An additional nine wetlands are identified as regionally significant (Lachlan CMA). The aquatic ecological community in the natural drainage system of the lower Lachlan River is also listed as an endangered ecological community in NSW.</p> <p>Such communities require protection, not thoughtless acceptance of a massive enterprise with a high likelihood of resulting environmental degradation.</p>	<p>As noted in the Biodiversity Development Assessment Report (BDAR), <i>"No important wetlands listed in the Directory of Important Wetlands in Australia are present in the study area and/or assessment area. No mapped areas of wetlands under the State Environmental Planning Policy (Coastal Management) 2018 are present in the study area and/or assessment area however, local wetlands within the assessment area occur in the form of farm dams."</i></p> <p>A detailed Stormwater Management Plan has been prepared by MPN Consulting Engineers and was included in the EIS. The Stormwater Management Plan documents the strategy to be implemented to ensure that the applicable criteria are achieved.</p> <p>In order to limit the site stormwater quantity discharge, runoff from each farm will be detained in five separate above ground basins. The basins have been oversized to compensate for the negligible increase in stormwater runoff from the internal roads which will bypass detention.</p> <p>In order to reduce overall post-development pollutant loads and concentrations, treatment solutions have been provided to remove hydrocarbons, suspended solids and nutrients prior to being discharged from site. Stormwater runoff from the sheds will be treated by grassed swales and the bioretention/detention basins prior to discharge to receiving waters. Stormwater runoff from the internal roads will be treated by a roadside swale proposed along the low side of the road.</p> <p>The Stormwater Management Plan confirms that stormwater quality and quantity treatment is achievable to the levels required by Weddin Shire Council and Industry Best Management Practice.</p> <p>With respect to stormwater quality, it is important to note that the proposed breeder / rearer poultry sheds are constructed on an elevated pad and concrete slab and surrounded by a waterproof blockwork at the base of the insulated panel wall. As such internal shed areas are entirely separated from interaction with stormwater or roof water. Any stormwater runoff from the site is therefore expected to be of high quality, similar to the quality of water runoff from the surrounding area, and as such places minimal risk to downstream waterways or water dependent ecosystems.</p>
<b>CULTURAL HERITAGE</b>	
<p>- The site is home to an Aboriginal cultural heritage site, near Wallah Wallah Creek, which intersects the property. The area is located within the impact footprint of the proposed access track and would be partially affect by the project. This is</p>	<p>The Environmental Impact Statement (EIS) included a thorough Aboriginal Cultural Heritage Assessment Report which was undertaken by Ozark Environment and Heritage. The site survey was attended by a site officer from the Cowra Local Aboriginal Land Council.</p>

MATTERS RAISED	APPLICANT'S RESPONSE
<p>disrespectful to First Nations People to build a poultry farm on land of cultural significance.</p> <ul style="list-style-type: none"> <li>- Causing disturbance of Aboriginal Cultural Heritage</li> </ul>	<p>The site survey identified one Aboriginal cultural heritage site and confirmed management and mitigation measures for this location which will need to be completed prior to the proposed work commencing.</p> <p>Correspondence has been received from Heritage NSW dated 23 December 2021 which states:</p> <p><i>“Heritage NSW concurs with all the recommendations documented in the ACHAR with respect to the management and mitigation of the Aboriginal cultural heritage sites and values associated with the proposal.”</i></p> <p>As such the findings and proposed mitigation and management measures outlined in the assessment are considered to be appropriate and will be adopted by the Applicant.</p>
PEST MANAGEMENT	
<ul style="list-style-type: none"> <li>- Flies are an additional common concern for residents living near poultry facilities. Research conducted by the Ohio Department of Health indicated that residences that were located within 800 metres of poultry facilities had 83 times the average number of flies. While the nearest rural dwelling is 1.5 kilometres from the closest poultry shed in the proposed development, the impact could still be considerable. Rats are also associated with poultry production and can be vector for disease transmission.</li> <li>- The inevitable proliferation of rats and flies will lead to use of control measures such as baiting and organophosphate containing insecticides with consequential impact on nutrient-sensitive ecosystems, resulting in biodiversity losses.</li> <li>- Causing 83 times the number of average flies. Rats are also associated with poultry production and can be a vector for disease transmission.</li> </ul>	<p>The proposed shed will accommodate a breeder / rearer birds and as such contain far fewer birds than broiler (meat chicken) farms. As such, the impact of the farms in terms of odour emissions and attraction of flies are significantly lower.</p> <p>In accordance with biosecurity requirements, the sheds are sealed to limit vermin entry to the internal areas. In addition, there are three levels of baiting undertaken on the farms and the site is also regularly serviced for pest control.</p> <p>The applicant operates in accordance with the <i>Best Practice Management for Meat Chicken Production in NSW</i> Guidelines. These guidelines include various steps to minimise the risk of pests in and around the farms as follows:</p> <ul style="list-style-type: none"> <li>- <i>Sheds are built and maintained to exclude wild birds</i></li> <li>- <i>Spilled feed is cleaned up immediately, as it attracts wild birds</i></li> <li>- <i>Rat-proof dwarf walls are maintained on sheds and entry points are blocked with durable materials (iron grills, heavy-gauge sheet metal and concrete)</i></li> <li>- <i>Breeding sites (e.g. holes, burrows, rubbish piles) are minimised</i></li> <li>- <i>A baiting program is maintained</i></li> <li>- <i>Bait stations are regularly checked and maintained to minimise risks to nontarget species</i></li> <li>- <i>A record of the baiting program is kept in accordance with the requirements of the National Farm Biosecurity Manual – Poultry Production (DAFF 2009) and the Pesticides Act 1999.</i></li> </ul> <p>The biosecurity and pest management actions to be implemented on the site have proved to be effective on multiple farms across Australia.</p>

MATTERS RAISED	APPLICANT'S RESPONSE
<b>HAZARDOUS MATERIALS</b>	
<p><u>Hazardous materials</u></p> <ul style="list-style-type: none"> <li>- A screening assessment of the dangerous goods to be stored on site found that the bulk storage of liquified petroleum gas (1 class 2.1 flammable gas) would exceed the storage thresholds listed in the State Environment planning Policies, so the site would be regarded as potentially hazardous. A definite Work, Health and Safety issues and breaches safety guidelines. The NSW government must not access this proposed if it breaches State Environmental Planning Policies. Policies are in place to protect and prevent disasters.</li> <li>- Bulk storage of liquified petroleum gas (a class 2.1 flammable gas) exceeding the storage thresholds listed in the State Environmental Planning Policies, so the site would be regarded as potentially hazardous.</li> </ul>	<p>The development is required to be assessed against the <i>State Environmental Planning Policy 33 – Hazardous and Offensive Development</i> due to the storage of gas and chemicals stored on the site.</p> <p>The SEPP33 Assessment is a screening was undertaken which determined that the storage volumes of LPG required a Preliminary Hazard Assessment (PHA) to be completed.</p> <p>The PHA assesses what the potential risks are, the consequence for an offsite impact, the frequency of such an event, and risks that could be reduced.</p> <p>The PHA found that the risks at the site boundary are not considered to exceed the acceptable risk criteria. As such, the development is compliant with the SEPP33 and is permitted within the current land zoning for the site.</p> <p>Despite this, the PHA provides recommendations for the design of the tanks and activities that should be undertaken around them. These have been set out in the management and mitigation strategies for the project and will be adopted by the Applicant.</p>
<b>CONTAMINATION</b>	
<p><u>Water Contamination</u></p> <ul style="list-style-type: none"> <li>- Poultry farms are associated with environmental contamination of surface water, groundwater, and the soil. The habitat of this area is dependent on the maintenance of pristine local creeks and streams.</li> </ul> <p>Poultry manure contains nitrogen, phosphorus, and other excreted substances such as hormones, antibiotics, pathogens, and heavy metals, such as arsenic, which are introduced through feed.</p> <p>Leaching and runoff of these substances has the well documented potential to result in contamination of surface water and groundwater resources<sup>5</sup>.</p> <ul style="list-style-type: none"> <li>- Manure also contains pathogens such as cryptosporidium and giardia species which can easily spread from manure to water supplies. Notably, poultry manure is not treated to remove these pathogens.</li> </ul>	<p>As the sheds are for breeder and rearer farms, the sheds are sealed with no birds roaming outside. All stormwater will be managed in accordance with the Stormwater Management Plan and all waste (such as spent litter, mortalities and other waste products) will be removed from site to a licenced facility.</p> <p>As there will be no birds outside of the sheds, there will be no manure to run off into any nearby waterways.</p>
<p><u>Soil contamination</u></p> <ul style="list-style-type: none"> <li>- This is also inevitable due to the leaching of drug residues such as antibiotics and hormones and heavy metals from feed. It</li> </ul>	<p>Whilst it is still a very widely believed myth in Australia, hormones are not added to chicken feed or in any way administered to chickens. It is actually illegal to use</p>

MATTERS RAISED	APPLICANT'S RESPONSE
<p>is also unclear how dead chickens will be disposed of and leaching of these substances directly from carcasses will contribute to contamination.</p>	<p>hormones in chicken production in Australia and has been for over 40 years.</p> <p>Furthermore, the sheds are sealed with no birds roaming outside. All stormwater will be managed in accordance with the Stormwater Management Plan and all waste (such as spent litter, mortalities and other waste products) will be removed from site to a licenced facility.</p> <p>With respect to waste and removal of mortalities, at no point will any dead birds be left to leach into the soil. This would not only cause a risk to soil contamination, it would also attract vermin and create an odour issue. Instead, the mortalities will be transferred to an on-site freezer for removal to either a rendering plant or licenced facility.</p>
<p><b>PLANNING</b></p>	
<p><u>Weddin LEP</u></p> <p>The proposed site is a primary production zone. According to the Weddin Local Environmental Plan 2011, the objective of the zone are, most notably, as follows:</p> <ul style="list-style-type: none"> <li>- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base</li> <li>- To encourage diversity in primary industry enterprises and systems appropriate for the area</li> </ul> <p>There is nothing sustainable or diverse about cramming a half a million non-native birds into sheds on the site. While the project would provide 50 people with employment, this is nowhere near enough incentive to overlook the catastrophic damage it would cause to residents in the area, the environment and the animals it warehouses.</p> <p>We hope you'll take our objections, along with the comments made by local residents, into account when making a decision on this application.</p> <p>The Grenfell Poultry Breeder Farm must be refused on all the above grounds.</p> <p>The proposed site is a primary production zone. According to the Weddin Local Environmental Plan 2011, the objectives of the zone are, most notably, as follows:</p> <ul style="list-style-type: none"> <li>- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base</li> </ul>	<p>The proposed use is defined as "intensive animal industry" which is a use which is permitted with consent in the RU1 Primary Production Zone of the Weddin Local Environmental Plan 2011.</p> <p>The proposed development has support from the local Council (Weddin Shire Council). In their correspondence dated 7 February 2022, the Director – Environmental Services states "<i>Council recognises the importance of the development to the local shire and is supportive of the proposal subject to appropriate measures being implemented to limit impacts on the local environment and amenity of the surrounding area</i>".</p> <p>The project has been shown to have positive economic and social impacts, whilst predominantly limiting environmental impacts to those parts of the site that have traditionally been used for agriculture/cropping and grazing.</p>


MATTERS RAISED	APPLICANT'S RESPONSE
<p>- To encourage diversity in primary industry enterprises and systems appropriate for the area.</p> <p>There is nothing sustainable or diverse about cramming half a million non-native birds into sheds on the site. While the project would provide 50 people with employment, this is nowhere near enough incentive to overlook the catastrophic damage it would cause to residents in the area, the environment, and the animals in warehouses.</p>	

I trust this information is of assistance. Please do not hesitate to contact either myself or David Ireland (Director – Planning) on 07 3220 0288 or via email [nicole@psaconsult.com.au](mailto:nicole@psaconsult.com.au) should you wish to discuss.

Yours sincerely,



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VERSION	DATE	DETAILS	AUTHOR	AUTHORISATION
V3	28 April 2022	FINAL	Nicole Boulton	 David Ireland