

Attn: Pamela Morales
Department of Planning, Housing and Infrastructure
12 Darcy Street
PARRAMATTA NSW 2150

Email: pamela.morales@planning.nsw.gov.au

Dear Pamela,

TAMWORTH REGIONAL COUNCIL SUBMISSION – STATE SIGNIFICANT DEVELOPMENT – TANGARATTA FEED MILL (SSD-58801472)

I refer to your correspondence received 09th October 2024 regarding the public exhibition of a State Significant Development, being the Tangaratta Feed Mill (SSD-58801472). Please find Tamworth Regional Council's comments on the proposal below.

GENERAL

Tamworth Regional Council (TRC) is generally supportive of agricultural and industrial developments that contribute to the region's economy; however, it is also mindful of the potential for such projects to have significant and long-term impacts on local communities within the Tamworth Region.

The proposed poultry feed mill is a key primary industry initiative that will support agricultural producers in the region by purchasing and processing raw ingredients and supplying poultry feed to the New England poultry cluster. This development aligns with the strategic objectives outlined in the *New England Northwest Regional Plan 2041* and the *Tamworth Regional Blueprint 100*.

The *New England Northwest Regional Plan 2041* provides a 20-year strategic land use planning framework designed to protect and enhance regional assets while promoting a sustainable future. *Objective 3* of the plan highlights the region's role as a hub for food processing clusters, specifically for chicken meat and egg production around Tamworth, centred around the Baiada processing plant in Tamworth.

Additionally, the *Tamworth Regional Blueprint 100* outlines a comprehensive strategy to guide the region toward its vision of economic prosperity and high living standards. *Priority 3.4* of the blueprint recognises Tamworth as a major centre for the production and processing of beef, lamb, and poultry products, which are distributed across New South Wales. The region's proximity to grain supplies, livestock operations, feedlots, sale yards, and processing facilities offers a competitive advantage to local producers. This sector holds significant potential for expanding meat processing capacity and advancing high-tech agribusiness solutions.

The proposed poultry feed mill aligns closely with the objectives of these strategic plans. By supporting the New England poultry cluster, the development contributes to the region's economic growth, innovation in agribusiness, and long-term sustainability, reinforcing its alignment with both regional and local strategic goals.

Council acknowledges the substantial benefits a project of this scale, with a capital investment exceeding \$100 million, could bring to the community. At the same time, Council is aware of the potential impacts the project may have, particularly on local residents. In light of this, the following considerations are outlined regarding this specific proposal.

RELEVANT ISSUES

Social & Economic Impact

Upon the review of the Social Impact Assessment (SIA) and Economic Impact Assessment (EIA) accompanying the SSDA, it is observed that the likelihood of residual negative social impacts, with the recommended mitigation measures in place, is anticipated to be minimal. The continuity in operational activities between the current and proposed feed mill on-site suggests that any remaining impacts are expected to be consistent with current levels and therefore are unlikely to present material concerns for nearby residents and workers. Further, it is noted that the SIA has identified potential impacts and proposed mitigation measures. Council supports the proposed mitigation strategies and recommends that the proponent give due consideration to any additional feedback from the local community surrounding the development site.

In terms of economic impact, Council acknowledges that, once complete and fully operational, the project is projected to create both direct and indirect employment, contributing positively to the local workforce.

Noise Impact

Council has reviewed the Noise Impact Assessment (NIA) submitted with this application and it is noted that noise emissions from the upgraded facility will meet the criteria established by the EPA's Noise Policy for Industry (NPfI) for nearby residential receivers under all weather conditions and throughout day, evening, and night operations. It is anticipated that noise levels from the site will generally align with or fall below the area's existing background noise levels. Given the industrial setting and regular traffic on nearby roads, any noise generated by the feed mill may occasionally be audible; however, it is unlikely to be intrusive for neighbouring residents.

However, it is noted that the Environment Protection Licence (EPL) associated with the current consent for the existing feed mill on site specifies that the proponent may only proceed with permanent 24-hour, 7-days-a-week truck movements if attended noise monitoring demonstrates compliance with the EPL's current noise limits. Council records indicate that the proponent submitted a modification application in 2018 but subsequently withdrew it, following Environment Protection Authority (EPA) advice regarding the EPL conditions.

The withdrawal correspondence also indicates that the proponent intended to seek an EPL variation with the EPA to trial 24/7 truck movements over a 3-month period to assess the noise impacts. There is, however, no information available to confirm that this trial or associated monitoring occurred. Should this data exist, it would be beneficial to include it as part of the current noise assessment to validate the predicted noise impacts from vehicle movements and confirm ongoing compliance with EPL noise requirements.

Traffic Impact

Council has reviewed the Traffic Impact Assessment (TIA) for the proposed development. Based on the review, it is identified that Wallamore Road is currently not gazetted for vehicles larger than a B-Double, while the Oxley Highway is approved for B-Triple and AB-Triple vehicles, and conditionally approved for A-Double vehicles. Should the applicant intend to access the site with vehicles larger than a B-Double, a route assessment must be prepared according to NHVR requirements for the "last mile" of the proposed transport route, specifically covering Bowlers Lane and Wallamore Road.

Deceleration and acceleration distances, along with BAL/BAR turn treatments, must be assessed for the largest intended vehicle at the site access and at relevant intersections along the transport route. Further, the site access should be designed to permit the largest vehicle to enter the site while an exiting vehicle holds before Wallamore Road.

Furthermore, the access must be widened with pavement of suitable depth to accommodate the swept path of the largest vehicle, and it should be sealed to ensure all-weather access and to prevent soil or loose gravel from being tracked onto Wallamore Road.

Water Supply

Upon the review of EIS, it is observed that section 2.6.1 indicates the consumption of average 368KL of potable water per week based on existing milling operations. However, there has been no mention on the change in demand based on the proposed development, hence, it is recommended that applicant provide details of water demand, including peak instantaneous flow rates, to determine if the existing water supply is adequate or requires upgrades.

Additionally, council recommends to levy contributions pursuant to Section 64 of the Local Government Act 1993 based upon water usage. Water Headworks contributions are calculated based on adopted rates under Councils Annual Operation Plan. Revised rates adopted in subsequent Annual Operation Plans will apply to Headworks Contributions paid in later financial years.

Stormwater

Based on the review of Stormwater Management Plan, council seeks confirmation on hydrological parameters used for stormwater design e.g., Australian Rainfall and Runoff (ARR) 2019, climate change rainfall multipliers, etc.

Additionally, it is recommended that Management of potential stormwater pollutants should be considered at the source for example clean-up of grain spills. This could be included in the OEMP.

Visual Impact and Landscaping

Council has reviewed the visual impact assessment and landscape character analysis provided in the EIS for the proposed Feed mill. It is identified that due to the feed mill's location, limited public vantage points, and existing rural buildings in the vicinity, the proposed development will not significantly impact public views or vistas. The visibility of the feed mill will be largely obscured by intervening trees and rural structures, with only the upper portions of the mill building, silos, and gantry visible.

Additionally, the surrounding area supports various agribusiness operations, including an existing feed mill, poultry farms, a dairy, a flour mill, and food processing plants. These large-scale agricultural and rural industrial operations are characteristic of the local landscape, and the presence of similar operations contributes to the area's distinct rural character. As such, the introduction of the new feed mill is not anticipated to significantly alter the landscape character.

In summary, council observes that the visual impact of the proposed feed mill on neighbouring residential receptors and public viewpoints will likely be moderate to low. Further, considering the presence of a similar industrial operation in this landscape context, the proposed development is not expected to significantly impact the overall landscape character.

Biosecurity

The EIS in Section 6.15 identifies the key biosecurity risk associated with the proposed feed mill and risk management procedures. Council supports the risk management procedures outlined in Baiada's National Biosecurity Manual, which aim to minimise the potential spread of disease through poultry feed or truck movements. These procedures include controlled material handling processes to prevent contamination, regular testing of feed materials to detect pathogens, strict sanitation measures within the facility to maintain cleanliness, and the implementation of staff protocols to limit disease transmission risks. Council believes these measures should effectively address the biosecurity risks associated with the feed mill operation.

Biophysical Impacts

The Secretary's Environmental Assessment Requirements (SEAR) issued on 26 June 2023 required the Environmental Impact Statement to address the following:

"Soil and Water- a surface water and groundwater assessment that includes:

- *an assessment of potential surface and groundwater impacts associated with the development, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby"*

The omission of this analysis in the submitted EIS leaves a gap in understanding the potential environmental impacts. Council strongly recommends that these requirements be addressed thoroughly to ensure an accurate and responsible evaluation of the development's effects on local soil and water resources.

Proximity to Airport

Pursuant to *Guideline C- Managing the Risk of Wildlife Strikes in The Vicinity of Airports of National Airport Safeguarding Framework (NASF)*, it is recommended that state, territory, and local governments assess and address potential wildlife hazards as part of land use planning and development assessment within a 13 km radius of airports. This guideline suggests consulting with wildlife hazard experts where appropriate.

Given the proximity of the proposed feed mill to Tamworth Regional Airport, located within this 13 km buffer, Council recommends the need to consider this matter. Additionally, to ensure the safety of aircraft operations near the proposed facility, it is advised that the application be referred to Airservices Australia (ASA), the Civil Aviation Safety Authority (CASA), and the Manager of Tamworth Regional Airport for their feedback.

Decommissioning of Existing Mill

Based on the Environmental Impact Statement (EIS) Sections 1.4 and 3.6.2, council notes that the existing mill is intended to cease operations upon the commencement and commissioning of Stage 2 of the proposed new mill. However, the existing mill will not be dismantled; instead, it will be retained onsite in a state of readiness to address contingency and risk management needs. In the event of a breakdown or equipment failure at the new mill that cannot be resolved within a few hours and that risks a shortfall in feed supply, the existing mill will be temporarily reactivated until the new mill is fully operational.

Considering this arrangement, council recommends a cumulative impact assessment of the two mills, considering the production capacity, environmental, social, and economic impacts when both mills are operational, even if temporarily. Council also recommends a detailed cumulative life cycle analysis of both the existing and proposed mills, with particular attention to periods when both may function concurrently. This analysis will help ensure that potential cumulative impacts are adequately evaluated, managed, and mitigated over the life cycle of both facilities.

Development Contributions

The Secretary's Environmental Assessment Requirements issued on 26 June 2023 required the Environmental Impact Statement to address the following:

"Planning Agreement/Development Contributions – demonstration that satisfactory arrangements have been or would be made to provide, or contribute to the provision of, necessary local infrastructure required to support the development"

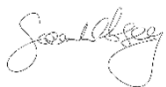
The EIS does not address this requirement, with the response "Noted" in Appendix A – SEARs Response Table is not considered adequate.

Consequently, Council requests a development contribution being 1% of capital investment value be levied prior to commencement of construction in accordance with Section 7.12 of the *Environmental Planning and Assessment Act 1979* and Council's *Section 7.12 (formerly Section 94A) Indirect Contributions Plan 2013*.

This approach is consistent with other rural industries, including State Significant developments, determined within the last 10 years in the Tamworth Regional LGA.

Should you require any clarification in relation to the matters raised above, please contact Council's Development Assessment Planner, Nivin Cleatus Pathrose, on the number below.

Yours faithfully,



Sam Lobsey
Manager, Development

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4 November 2024