

17 June 2025

Contact: Justine Clarke
Telephone: 0457 535 955
Our ref: D2025/82408

Sally Munk
Principal Planner
Department of Planning, Housing & Infrastructure
GPO Box 39
Sydney NSW 2001

Rushes Creek Poultry Production Farm (SSD-7704-MOD-6) – Stage 2 Reconfiguration & Water Management

Dear Ms Munk,

Thank you for your Major Projects Planning Portal referral dated 03 June 2025 requesting WaterNSW's advice in relation to the above Modification.

The subject site is immediately adjacent to Lake Keepit, managed by WaterNSW for irrigation supply in the Namoi Valley and town water supply in Walgett. A licence has been established across WaterNSW (WAMC) land to the north, on the boundary with the Namoi River flowing into Lake Keepit, for the use and maintenance of water and power supply infrastructure for the farm. We note no changes to this arrangement.

After reviewing the Rushes Creek SSD-7704-Mod-6 Modification Report and associated appendices, we understand that the Modification includes the following amendments:

- Deletion of Farm 3 and renaming of Farm 4 to Farm 3;
- Reconfiguration of Farms 1 and 4 to support the balance of birds for Stage 2. This includes new sheds for the remaining sheds to maintain approved densities;
- Increase in total bird population on site from 3,051,000 birds to 3,070,140 birds;
- Adjustment to site infrastructure to accommodate new site layout;
- Construction of emergency overflow spillways within farm 1 & 3 stormwater attenuation ponds;
- Addition of a water recycling system from the stormwater attenuation ponds into the new dams (near Farm 2);
- Amend Condition B20(f)(iii) to ensure no discharges occur from the detention dams unless done naturally via the spillway or released into the approved water storage dams for reuse on the farm;

It is noted that the summary of modifications to SSD 7704 within the Modification Report (pg ii) and the terminology concerning stormwater management differs throughout the project reports. The stormwater basins are called sediment basins, detention dams, and stormwater attenuation ponds. Consistency or clearer labelling throughout the documents and subsequent modified development consent should be exercised.

Alterations and additions to the existing stormwater detention basin system and operations

While the Modification does not include any new works within 40m of the Namoi River embankment or riparian corridor area, it is noted that;

- the installation of a spillway will result in an uncontrolled discharge point from the detention basin systems (both farm 1 & 3). The previous approved design identified these basins as closed systems, with no discharge points.
- the receiving environment for the unattenuated flows from farm basin 1 will be the Namoi River (Lake Keepit) approximately 850m north west of the farm, and that the basin flows from farm 3 will reach lake Keepit via 'Plain Gully' drainage line to the south west (reference = drawing C1300 of the Maven Civil Design Set).
- the detention basins will contain nutrients from the washout of the poultry sheds, although diluted with clean water from the shed roofing.

It is unclear from section 3.3 of the Modification Report on which detention basin the spillway will be installed, stating '*As part of MOD 6, a spillway is proposed to be constructed on the northern embankment of the existing detention basin.*' Clarification is required as to which detention basin this relates, or does it relate to the detention dam.

The required alterations and additions to the existing stormwater system and operations were to be detailed in an updated Stormwater Management Plan (Appendix K). However, the plan does not clearly cover those items to be considered, as raised in section 7.3 of the Modification report, being:

- Surface and ground water management relating to the spillway;
- Discharge of water via spillways into drainage line;
- Resizing of dams to suit revised design and cater for shed numbers; and
- Connecting the detention basins associated with each Farm to the dams.

WaterNSW requests that in the response to submissions that the proponent clearly list the location/s of the spillway installation, provide further justification as to the change from a closed stormwater management system to now include a discharge point over the spillway, and that the Stormwater Management Plan be updated to clearly demonstrate the proposal changes.

SEARS requirements

It is our assessment that not all of the Environmental Assessment Requirements issued by DPHI (dated 15 October 2024) and detailed in Table 2 of the modification report have been addressed. Specifically, details on water and wastewater conditions and changes due to the modification proposal. The modification report and Appendix K do not contain sufficient assessment of the stormwater and wastewater management system associated with the Modification, and how they integrate with existing operations, including measures to treat, reuse or dispose of water.

In addition, it is noted in Appendix K that the attenuation ponds will be dewatered via a pump system and distributed on site with no offsite discharge expected. However, no dewatering and reuse calculations or a dewatering strategy have been included. Without an updated site water balance (as required by the SEARs) including a description of the water demands and breakdown of water systems, it is unclear if the site can retain stormwater onsite with no offsite discharge, as claimed.

Considering both potential for overspill to occur during storm events and the undesigned water reuse and recycling systems, we have significant concerns for water quality entering Lake Keepit, with the short control time. The proponent has not demonstrated that water discharge and water quality design will have little to no additional effect on the receiving environment.

Adjacent Property Impacts

The modified farm 1 footprint, including the perimeter bund and swale, is now located directly adjacent to the property boundary with Lot 432 DP 1144077 (WaterNSW owned land), with an 11m separation. The reduction in buffer area will potentially induce access and maintenance impediments for WaterNSW, such as waterlogging along the boundary. WaterNSW requests that the buffer between farm 1 and WaterNSW land be re-assessed and increased to reduce any impacts outside of the development site.

WaterNSW requests that all the items raised within this response are considered and addressed in the response to submissions.

If you have any questions regarding this letter, please contact me at justine.clarke@waternsw.com.au.

Yours sincerely,



JUSTINE CLARKE

A/ Environmental Planning Assessments & Approvals Manager