PSA CONSULTING

LAND USE CONFLICT RISK ASSESSMENT

Tangaratta Feed Mill

25 November 2025

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1. INTRODUCTION

This Land Use Conflict Risk Assessment (LUCRA) has been prepared as part of an Environmental Impact Assessment (EIS) to accompany a State Significant Development Application for the construction and operation of the Tangaratta Feed mill. This LUCRA should be read in conjunction with the EIS

The project involves the construction of a new, poultry feed mill at 771 Wallamore Road, Wallamore NSW, approximately 9.5km northwest of the Tamworth Central Business District. The site contains the existing feed mill which has been operated by Tangaratta Stockfeeds Pty Limited since 1975.

This LUCRA considers the sites suitability, the regional implications of the proposed use and provides commentary on compatibility of the proposed feed mill with other local activities.

1.1 SCOPE OF WORKS

DPI Agriculture recommended that the Applicant prepare a Land Use Conflict Risk Assessment (LUCRA) as part of the Secretary's Environmental Assessment Requirements (SEARs) for the project.

The purpose of this LUCRA is to identify the compatibility and potential conflicts between the proposed development and neighbouring land uses and to identify appropriate avoidance and mitigation measures.

The assessment aims to:

- Accurately identify and address the efficacy of risk of conflict between the proposed use and adjoining land uses before a new land use proceeds or before dispute arises.
- Objectively assess the effect and level of the proposed land use on neighbouring land uses.
- Increase the understanding of potential land use conflict to inform and complement development control and buffer requirements; and
- Highlight or recommend strategies to help minimise conflict and contribute to the development of separation strategies.

(Source: NSW DPI Land Use Conflict Risk Assessment Guide, 2011)

The assessment comprises four-stages, including:

1. Information gathering - site characteristics, the nature of development proposed and surrounding land uses.
2. Risk Level Evaluation - identification and recoding of activities and conflict analysis.
3. Identification of Risk Mitigation Strategies - assess strategies to manage risk of potential conflict.
4. Review and recommendations - recommendations and management strategies.

2. INFORMATION GATHERING

2.1 NATURE OF THE LAND USE CHANGE AND DEVELOPMENT

The proposal relates to land at 771 Wallamore Road, Wallamore which contains the current Tangaratta Stockfeeds poultry feed mill. The site is formally described as Lot 4 on DP578865 and has an area of 40.62ha. As shown in Figure 1, the site has been historically cleared and used for agricultural and rural industry purposes while the central portion of the site subject to re-vegetation with planted natives undertaken by the Applicant.

The application will also include Lot 1 on DP1077646 as the existing access driveway to the site traverses the Main Northern Rail Line Corridor. This is an unconstructed rail corridor running north / south along Wallamore Road owned by the NSW State Rail Authority and managed by UGL Regional Linx.

The project involves the construction of a new, poultry feed mill at 771 Wallamore Road, Wallamore NSW, approximately 9.5km northwest of the Tamworth Central Business District. The site contains the existing feed mill which has been operated by Tangaratta Stockfeeds Pty Limited since 1975.

The existing mill produces specialised feed blends which supply the poultry farming operations within the New England Region. The existing feed mill has an approved production volume of 10,000 tonnes per week, however truck movements are current limited to the hours of 6am – 10pm by the staging imposed within the Environmental Protection License (EPL).

Specifically, this modification application involves the amendments to production volumes of feed being generated from the feed mill. The proposed development includes the construction of a new poultry mill on the site which will produce 14,000T of feed per week, as well as the retention of the existing mill which will produce 2,200T of feed per week. While the new mill will operate up to 24 hours per day, 7 days per week, operation of the existing feed mill will be limited to the day period (7am – 10pm). As per the original application, the increase in feed production at the site is required to support the projected growth in poultry production within the New England Region.

TANGARATTA FEED MILL		
ISSUE	**DEVELOPMENT AS SUBMITTED**	**PRPOSED AMENDING DEVELOPMENT**
SITE LOCATION	771 Wallamore Road, Wallamore Lot 1 on DP1077646 (Mill Site) Lot 1 on DP1077646 (Rail Corridor Crossing)	771 Wallamore Road, Wallamore Lot 1 on DP1077646 (Mill Site) Lot 1 on DP1077646 (Rail Corridor Crossing) **(No Change)**
SITE AREA	40.62 Ha	40.62 Ha **(No Change)**
OPERATIONS	The development involves the construction and operation of a new poultry feed mill with the capacity to produce up to 17,500 tonnes per week. The existing mill was to operate during daylight hours as part of Stage 1 to produce up to 2,500 tonnes per week. During Stage 2 production was to increase to 17,500 tonnes per week, with the old mill retained on site in a state of readiness for contingency and risk management purposes only.	The amended application involves the construction and operation of a new poultry feed mill with the capacity to produce up to 14,000 tonnes per week. The existing mill will be retained on site and will be operated during daytime hours to produce up to 2,200 tonnes per week.

TANGARATTA FEED MILL		
PRODUCTION CAPACITY	• 17,500 tonnes per week.	• 16,200 tonnes per week. **(Reduction in 1,300 Tonnes per week)** The current operation has an approved production of 10,000 tonnes per week. While the existing mill will continue to operate under its current approvals and Environmental Protection License (EPL), subject to approval of this application a Modification Application and Variation to the EPL will be sought to align the production levels and hours of operation with the approved regime. This will be undertaken prior to commencement of operations at the new mill and can be conditioned accordingly.
PHYSICAL WORKS	• An extension of the existing, internal access driveway, connecting to Wallamore Road. • 2 Weighbridges and a weighbridge office for both incoming and outgoing trucks. • Truck parking and manoeuvring areas. • An enclosed intake building for transfer of incoming ingredients from trucks to storage silos. • 26 Storage Silos allowing holding grain and other ingredients prior to processing. • A warehouse for storage of the ingredients blended with the grains. • A mill tower incorporating all processing equipment required to create palletised poultry feed products. • Out loading silos and buffer storage for holding poultry feed prior to dispatch into trucks. • Boiler house and maintenance workshop. • Use of the existing storage bunkers for bulk storage of grain. • Administration building and staff amenities. • Driveways, parking and manoeuvring areas and truck wash.	• An extension of the existing, internal access driveway, connecting Wallamore Road. • 2 Weighbridges and a weighbridge office for both incoming and outgoing trucks. • Truck parking and manoeuvring areas. • An enclosed intake building for transfer of incoming ingredients from trucks to storage silos. • 14 Storage Silos allowing holding grain and other ingredients prior to processing. • A warehouse for storage of the ingredients blended with the grains. • A mill tower incorporating all processing required to create palletised poultry feed products. • Out loading silos and buffer storage for holding poultry feed prior and dispatch into trucks. • Boiler house and maintenance workshop. • Use of the existing storage bunkers for bulk storage of grain. • Administration building and staff amenities. • Driveways, parking and manoeuvring areas and truck wash. • Stormwater swales and a detention basin.

TANGARATTA FEED MILL		
	• Stormwater swales and a detention basin. • An acoustic wall / mound in the western corner. • Earthworks including ancillary borrow pits associated with construction of the mill building platform, access roads and stormwater infrastructure.	• An acoustic wall / mound in the western corner. • Earthworks including ancillary borrow pits associated with construction of the mill building platform, access roads and stormwater infrastructure.

STAGING	**Stage 1: 12,500 Tonne per week:**
	• Retention of the existing feed mill with daytime milling (2,500T per week).
	• Construction of the new feed mill (10,000T per week) including:
	  ○ All access roads, weighbridges, car parking and truck manoeuvring areas.
	  ○ Connection of all necessary infrastructure and services.
	  ○ Intake building.
	  ○ 13 grain and meal storage silos.
	  ○ Bunded Liquid storage areas.
	  ○ Milling Line 1 and 2.
	  ○ Out loading Area / Feed Storage Silos
	  ○ Warehouse
	  ○ Broiler Room
	  ○ Workshop
	  ○ Office and Administration Building.
	  ○ Stormwater Management system.
	  ○ Acoustic Mound / Wall
	Stage 2: 17,500 Tonnes per week.
	• Decommissioning of the existing mill (retained in a state of readiness).
	• Additions to the new mill including:
	  ○ Milling Line 3 and 4.
	  ○ 13 grain and meal storage silos.
		No Staging: 16,200 Tonnes per week
		• Retention of the existing feed mill with daytime milling (2,200T per week).
		• Construction of the new feed mill (14,000T per week) including:
		  ○ All access roads, weighbridges, car parking and truck manoeuvring areas.
		  ○ Connection of all necessary infrastructure and services.
		  ○ Intake building.
		  ○ 14 grain and meal storage silos.
		  ○ Bunded Liquid storage areas.
		  ○ Milling Line 1 and 2.
		  ○ Out loading Area / Feed Storage Silos
		  ○ Warehouse
		  ○ Broiler Room
		  ○ Workshop
		  ○ Office and Administration Building.
		  ○ Stormwater Management system.
		  ○ Acoustic Mound / Wall

TANGARATTA FEED MILL		
	○ 7 Buffer Storage Bins for holding additional finished product.	
IMPACT FOOTPRINT	• 6.03 HA	• Approximately 6.0 HA
MAXIMUM HEIGHT	• 36.615m	• 36.615m **(No Change)**
SUPPORTING INFRASTRUCTURE	• Extension of existing water, gas and electricity connections • On site Septic System to treat wastewater from Staff Amenities.	• Extension of existing water, gas and electricity connections. • On site Septic System to treat wastewater from Staff Amenities. **(No Change)**
ACCESS	• An extension of the existing driveway, connecting to Wallamore Road.	• An extension of the existing driveway, connecting to Wallamore Road. **(No Change)**
CAR PARKING	• 24 new parking spaces • Retention of the 20 spaces provided at the existing mill.	• 24 new parking spaces • Retention of the 20 spaces provided at the existing mill. **(No Change)**
HOURS OF OPERATION	• 24 hours per day / 7 days per week.	• New feed mill to operate 24/7. • Existing mill to operate during daytime and evening period only (7am – 10pm).
TRAFFIC	• Approximately 809 truckloads (1,618 trips) per week. • Approximately 135 truckloads per day (270 trips) per day.	• Approximately 750 truckloads (1,500 trips) per week. • Approximately 108 truckloads per day (216 trips) per day. As identified, there is a lower traffic numbers anticipated based on the proposed changes.

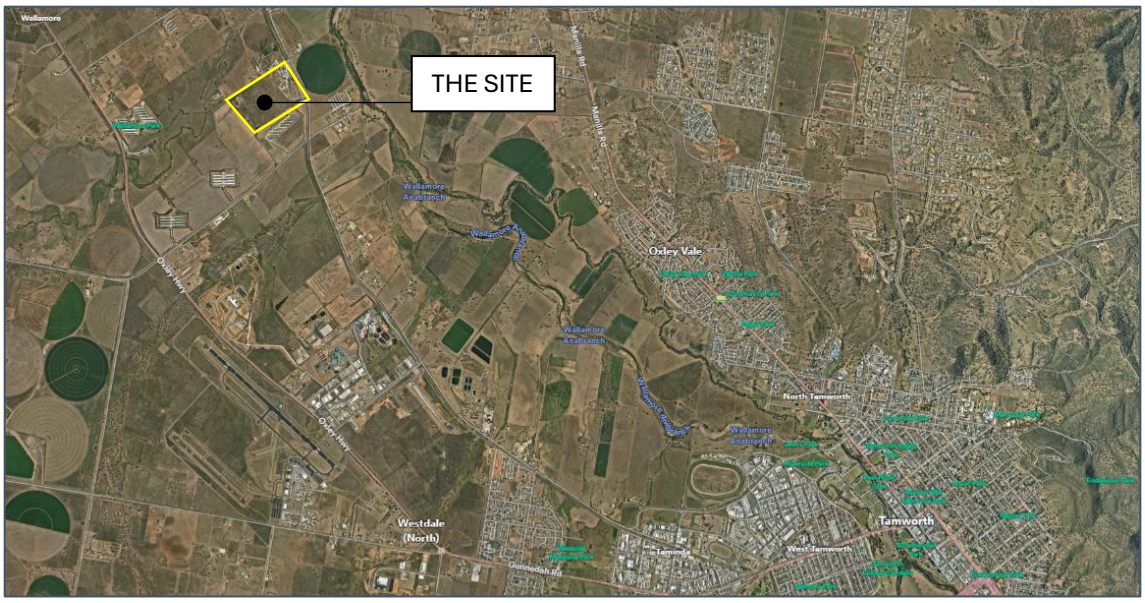

Figure 1: Site Location (Nearmap, 2024)

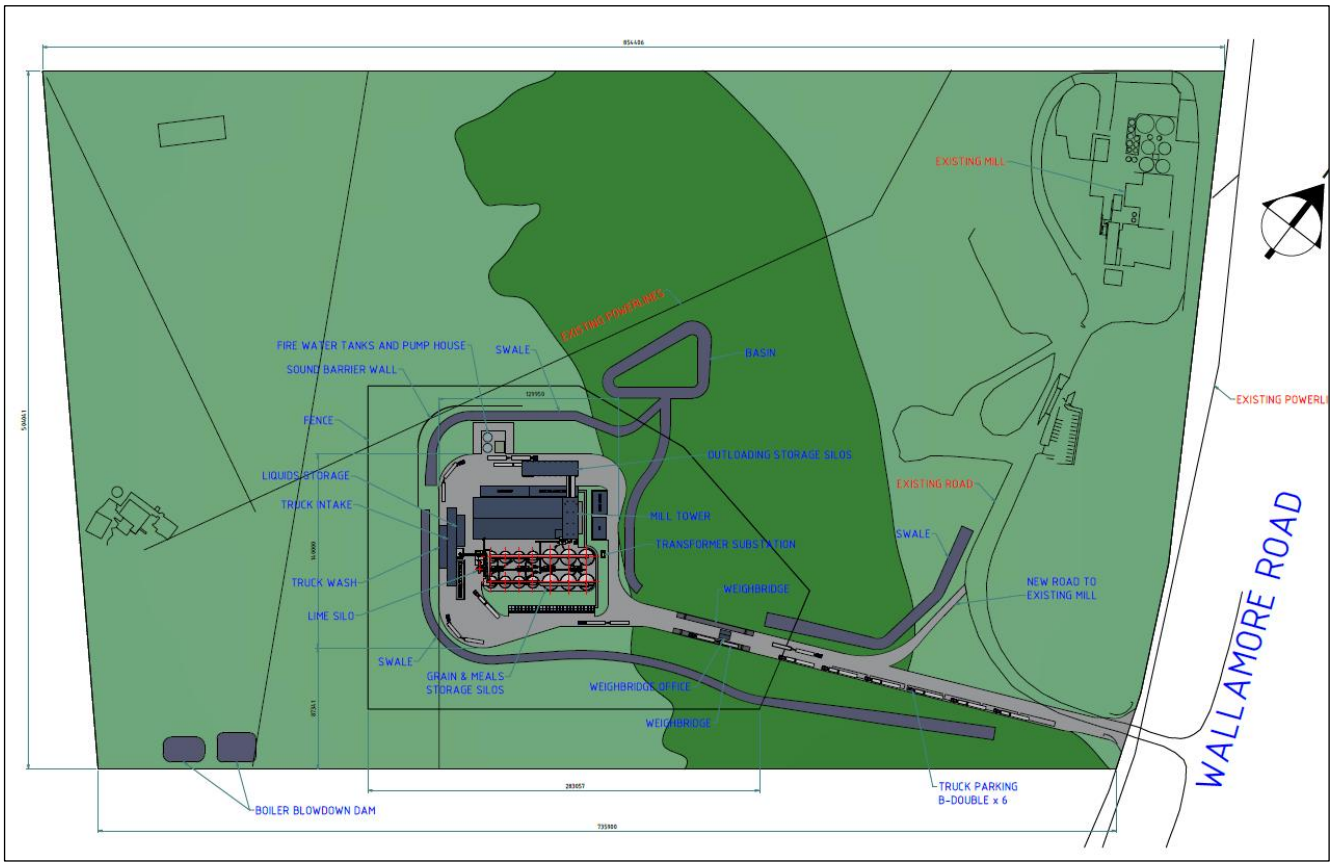

Figure 2: Proposed Site Plan (LGPM, 2024)

2.2 SURROUNDING AREA

The subject site is located approximately 9.5km north west of the Tamworth CBD. In addition, to extensive agriculture and grazing activities, land uses which surrounding the site include the following:

- A dairy adjoining the property directly to the north (also contains a dwelling).

- The Rosebank Feed Cleaning and Storage Business to the East on the opposite site of Wallamore Road opposite the subject site (also contains a dwelling).
- The Wallamore Grain and Produce Farm located approximately 1,700m to the Nort East.
- Bellata Gold Pasta Flour Mill located on Bowlers Lane approximately 1,000m to the south.
- Baiada's Bowlers Lane Broiler Farms (3), located on the northern side of Bowlers Lane to the south.
- The Klassen Broiler Farm, located on the opposite side of Wallamore Road to the South East.
- The Oakburn Integrated Poultry Processing Plant (SSD-9394) to the south fronting the Oxley highway.
- Multiple poultry, broiler and breeder farms to the north and west.

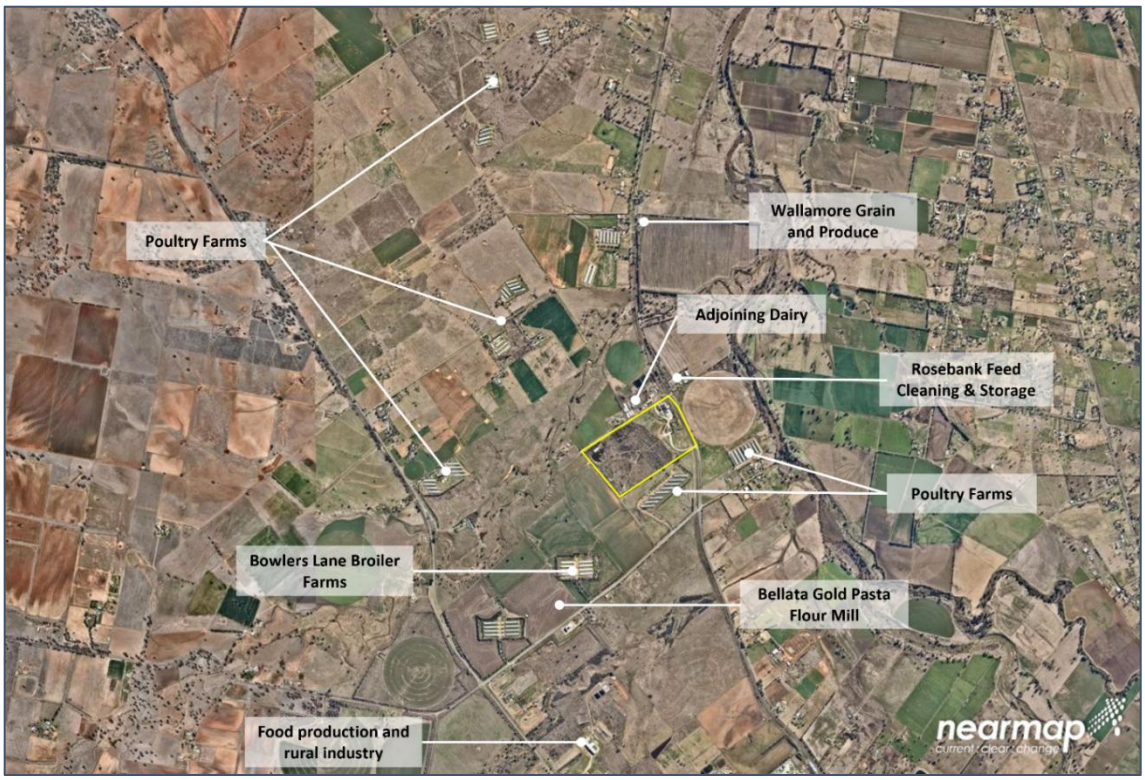

Figure 3: Site Context (Nearmap, 2023)

As shown in Figure 4, there are 10 sensitive receptors (residential dwellings on rural properties) within 1 km of the feed mill site, with the closest being located approximately:

- 310m to the North.
- 530m to the West.
- 690m to the North East.
- 710m to the East.

Figure 4: Sensitive Receptors within 1km of the Site (Nearmap, 2023)

2.3 TOPOGRAPHY, CLIMATE AND NATURAL FEATURES

2.3.1 Topography

The site is located on the slopes of the Peel River flood plain. The local topography is characterised by moderately undulating hills with open agricultural land, falling to the narrow alluvial floodplains of the Peel River and nearby Tangaratta Creek (~700m west of the proposed mill site). The terrain of the site and the immediate surrounding area is generally characterised as flat, with a gentle fall of approximately 9m from the southern to northern boundary (~500m).

2.3.2 Geology and Soils

According to the Soil Landscapes of the Tamworth 1:100,000 Sheet (DCCEEW, 2024) the entire subject land occurred on the Glenmore (gm) Soil Landscape. Soil types are dominated by very deep, imperfectly drained Black Vertosols (Black Earths) with some very deep, imperfectly drained Red and Brown Vertosols (Red and Brown Clays) and minor occurrences of moderately deep, moderately well-drained Red Chromosols where underlying sedimentary bedrock outcrops.

The surface geology as indicated by the NSW Government online spatial tool, MinView, comprises of the Late Devonian age Noumea Beds, part of the Parry Group, consisting of interbedded massive and andesitic-lithic greywacke, pebbly greywacke and laminated siltstone and mudstone.

A geotechnical investigation has been undertaken by JK Geotechnics. The boreholes undertaken as part of the Geotechnical Investigation disclosed a subsurface profile generally comprising of residual clays of medium to high plasticity and siltstone at variable but shallow depths. The bedrock was generally either initially low strength before quickly becoming high strength or was high strength at first contact. No groundwater was encountered during the investigation.

2.3.3 Flooding and Drainage

Tamworth Regional Council's City-Wide Flood Investigation includes an expanded study area taking into account Tangaratta Creek (North of the site) and Bolton's Creek (South of the site). As demonstrated in this investigation, the site is not subject to inundation during a 1% ARI Flood event.

The site generally falls from the southern boundary to the north towards Wallamore Road, where there are a series of cut off drains directing stormwater flow to the western dam and the road table drains. No external catchments appear to flow through the site, as the southern neighbour cuts off their overland flow with bunds and swales and directs it along the boundary toward Wallamore Road.

2.3.4 Ground Water

There are two bores on the property are licensed as 90WA815949 (adjoining the existing feed mill) and 90WA818666 (in the western corner of the site). GW043960 had water bearing zones between 18.2m and 18.8 m and at 30.4m depth below ground level. This bore had a recorded topsoil depth of 0.61m and was drilled through a shale and fractured rock sub-strata. The original yield from this bore was 0.45 L/s which is considered sufficient for a small stock water supply.

The western bore GW038178 was drilled for industrial purposes in 1975 and therefore it is assumed to have been drilled for the rendering plant. The bore was drilled to a total depth of 35m through topsoil, shale, and fractured basalt. The shallowest aquifer was located 12.1m to 12.4 with a further two aquifer below. All aquifers are in fractured basalt. No yield is available for this bore.

As noted in the Geotechnical Investigation, groundwater was not encountered in any of the boreholes and is generally not expected to be encountered on the site other than surface run-off. Minor seepage may be encountered within the localised deeper excavation within the western portion of the site associated with the intake building.

2.3.5 Vegetation

Historically the subject land (the impact area) and broader study area (Lot 1 DP1077646) has been cleared as a result of the past agricultural and feed mill activities. However, the location of the proposed mill was subject to voluntary re-vegetation undertaken by the Applicant in 2001.

The new feed mill has an impact area of 6.03ha. The impact area contains planted native trees within the central portion, grassland within the far west and maintained low grassland in the east along the road to the existing feed mill. The vegetation surveys determined that the impact area includes the following assemblages:

- Planted Native Trees (2.70 ha).
- Derived Grassland (2.74 ha).
- Low Maintained Introduced Grassland (0.50 ha).
- Introduced Vegetation (0.13 ha).

Due to the composition of the ground layer and the presence of the Blakey's Red Gum adjoining the site, the two vegetation areas were considered to be disturbed variations of PCT 599 - Blakely's Red Gum - Yellow Box grassy tall woodland on flats and hills in the Brigalow Belt South Bioregion and Nandewar Bioregion, as such, assessment under the BC Act and the preparation of a BDAR was required.

The submitted BDAR provides detailed consideration of impacts on significant flora, fauna, and ecological communities which demonstrates that the project will not result in any unacceptable impacts on the natural environment. Mitigation measures have also been proposed as part of the construction and operation phase to help minimise the potential impacts to biodiversity values that remain present within the study area.

2.4 SITE HISTORY

The existing feed mill is located in the northern corner of the site, fronting Wallamore Road. This was originally purchased as an operating feed mill in 1975, with a production volume of 950 Tonnes per week. Since, this time, the feed mill has been progressively upgraded and expanded to allow for increases in production, commensurate with the growth of the poultry cluster in Tamworth. The mill and associated grain storage bunkers occupies and area of

~5.8 Ha and includes a managers residence. A photo of the existing mill from Wallamore Road is provided in **Figure 5** below.

Figure 5: Photograph of Existing Mill (Google Maps, 2024)

The current operation has an approved production of 10,000 tonnes per week. Error! Reference source not found. identified the historic development approvals relevant to the current feed mill on the site. To service the current poultry cluster, the existing mill current produces up to 4,410 T of feed per week. As such, the proposed development will result in a 50% reduction in milling compared to current operations. Table 1 identifies the historic development approvals relevant to the current feed mill on the site.

Subject to approval of this application a Modification Application and Variation of the EPL will be sought to introduce these limits to the current approval regime. This will be undertaken prior to commencement of operations at the new mill and can be conditioned accordingly.

Table 1: Historic Development Approvals

DEVELOPMENT APPROVAL	DESCRIPTION
1975	• Site was purchased as an operating feedmill. • Production levels at 950 tonnes per week
1987 **Parry Shire Council** **DA 87/81**	• Operations increased to 24 hours per day, 6 days per week • Transport of raw ingredients and finished product increased to 7 days per week between of 7am – 8pm. • Production levels increased 2,600 tonnes per week.
1993 **Parry Shire Council** **Amendment to DA 87/81**	• Heavy Vehicles increased to 7 days per week between 6am and 10pm.
DA 2000/428 **Tamworth Regional Council**	• Production levels increased to 10,000 tonnes per week. • All Operations increased to 24 hours per day, 7 days per week. • The EPA GTAs/ EPL included 4 stages to increase capacity and requirements for acoustic modelling prior to commencement of the next stage. • At present, the site operates at Stage 3 with truck movements to the day / evening period (6am – 10pm), while a trial is undertaken to determine compliance.
DA0169/2014 **Tamworth Regional Council**	• Demolition and replacement of boiler shed.

DA2016/0377 **Tamworth Regional Council**	• Construction of additional acoustic walls to the north east and north west site boundaries.

2.5 CONSULTATION

PSA Consulting engaged The Comms Team to prepare an engagement strategy to guide consultation for the proposed SSD. The engagement strategy included commitments and approaches to ongoing forms of consultation.

Consultation during the scoping stage for the project consisted of:

- A community notification letter issued to neighbouring properties.
- A media release provided to Northern Daily Leader and ABC New England North West.
- A Print Advertisement was placed in Northern Daily Leader.

Outside of the Secretary's Environmental Assessment Requirements (SEARs) request and the referrals undertaken by the Department of Planning, additional consultation was undertaken by PSA with a number of government agencies as per the following:

- Submission of a Request for EIS Requirements to Essential Energy on 24 January 2024;
- Submission of a Request for EIS Requirements to Department of regional NSW – Local Land Services on 24 January 2024;
- Submission of a Request for EIS Requirements to UGL Regional Linx on 24 January 2024.

It is also noted that OzArk undertook an Aboriginal Cultural Heritage Assessment which included consultation with the registered Aboriginal parties (RAPs).

Feedback and concerns raised during consultation include:

- The community wants to be informed of project updates
- There is local media interest in the project
- Concerns about visual impacts to adjacent properties
- Concerns about construction and operational impacts

The above feedback and concerns have been considered in the risk assessment in Section 3 of this LUCRA.

3. POTENTIAL LAND USE CONFLICTS

3.1 INTRODUCTION

Table 5 shows the LUCRA matrix which identifies risk rankings from 1 to 25 for each set of probabilities (A-E) (refer to **Table 6**) and consequences (1-5). A rank of 25 is the highest magnitude of risk, i.e. a highly likely and very serious event. A rank of 1 represents the lowest magnitude of risk, i.e. an almost impossible and very low consequence event. Priority is given to those activities listed as high risk. This helps to rank multiple effects and provide a priority list when developing management strategies.

Table 2: Risk Ranking Matrix (Department of Primary Industries, 2011)

	Probability				
Consequence	A	B	C	D	E
1	25	24	22	19	15
2	23	21	18	14	10
3	20	17	13	9	6
4	16	12	8	5	3
5	11	7	4	2	1

Table 3: Probability Table (Department of Primary Industries, 2011)

Level	Descriptor	Description
A	Almost certain	Common or repeated occurrence
B	Likely	Known to occur
C	Possible	Could occur
D	Unlikely	Could occur in some circumstances, but not likely to occur
E	Rare	Practically impossible

Table 4: Measure of Consequence (Department of Primary Industries, 2011)

LEVEL 1	**DESCRIPTOR: SEVERE**
Description	• Severe and/or permanent damage to the environment • Irreversible • Severe impact on the community • Neighbours are in prolonged dispute and legal action involved
Example or Implication	• Harm or death to animals, fish, birds or plants • Long term damage to soil or water • Odours so offensive some people are evacuated or leave voluntarily • Many public complaints and serious damage to Council's reputation • Contravenes Protection of Environment & Operations Act (POEO Act) and the conditions of Council's licences and permits. Almost certain prosecution under the POEO Act.
LEVEL 2	**DESCRIPTOR: MAJOR**
Description	• Serious and/or long term impact to the environment • Long-term management implications

	• Serious impact on the community • Neighbours are in serious dispute
Example or Implication	• Water, soil or air impacts, possibly in the long term • Harm to animals, fish, birds or plants • Public complaints. Neighbour disputes occur. Impacts pass quickly • Contravenes the conditions of Council licences, permits and the POEO Act • Likely prosecution
LEVEL 3	**DESCRIPTOR: MODERATE**
Description	• Moderate and/or medium-term impact to the environment and community • Some ongoing management implications • Neighbour disputes occur
Example or Implication	• Water, soil or air known to be affected, probably in the short term • No serious harm to animals, fish, birds or plants • Public largely unaware and few complaints to Council • May contravene the conditions of Council's licences and the POEO Act • Unlikely to result in prosecution
LEVEL 4	**DESCRIPTOR: MINOR**
Description	• Minor and/or short-term impact to the environment and community • Can be effectively managed as part of normal operations • Infrequent disputes between neighbours
Example or Implication	• Theoretically could affect the environment or people but no impacts noticed • No complaints to Council • Infrequent disputes between neighbours
LEVEL 5	**DESCRIPTOR: NEGLIGIBLE**
Description	• Very minor impact to the environment and community • Can be effectively managed as part of normal operations • Neighbour disputes unlikely
Example or Implication	• No measurable or identifiable impact on the environment • No measurable impact on the community or impact is generally acceptable

3.2 INITIAL RISK IDENTIFICATION AND RISK RANKING

The risk assessment identifies and evaluates potential land use conflicts associated with the proposed Tangaratta Feed Mill. A risk ranking is determined based on probability and consequence, and a revised risk ranking is determined based on implementation of the management strategies identified in the EIS. A detailed risk assessment is provided in the EIS and a summary of the risk assessment is provided in Table 5.

Table 5: Initial Risk Identification and Risk Rating

POTENTIAL CONFLICT / SOURCE	EXPLANATION	RISK PROBABILITY LEVEL	RISK ASSESSMENT WITHOUT MITIGATION		RISK ASSESSMENT WITH MITIGATION	
			CONSEQUENCE LEVEL	RISK RATING	CONSEQUENCE LEVEL	RISK RATING
Biodiversity	Ecological impacts on local ecosystems	D	3	9	4	5
Heritage	An artefact is found/disturbed	D	3	9	4	5
Contamination	Operations result in contamination of soil	D	3	9	4	5
Stormwater	Stormwater runoff causing impacts downstream impacts	C	3	13	4	8
Air Quality	Odour creating a nuisance	D	4	5	4	5
Noise	Operational noise creating a nuisance	D	3	9	4	5
Traffic	Additional traffic movements causing a nuisance	B	3	17	4	12
Chemical Use and Storage	Chemical spill	D	4	5	4	5
Dust	Dust creating a nuisance	C	3	13	4	8
Bushfire	Operations increase risk of bushfires	C	3	13	4	8
Waste	Storage of waste causing odour or vermin impacts	D	4	5	4	5
Biosecurity	Risk to biosecurity of	D	2	14	4	5

	agricultural production areas					

3.3 RISK REDUCTION CONTROLS

Consistent with the LUCRA Guide, an objective of the LUCRA is to identify and define management strategies that lower the risk ranking score to low risk (8 or below).

Management strategies and performance targets are defined below and detailed in **Appendix A**.

Management strategies are developed to minimise the effects or potential for land use conflict to occur.

Performance targets are identified for each management strategy, detailing how the effectiveness of the strategy will be monitored.

3.4 PERFORMANCE MONITORING

Performance monitoring is required to ensure management strategies minimise the risk of potential land use conflicts during all stages of the project.

Various management plans will be prepared and implemented during the construction, operational and decommissioning phases of the project, including:

- Construction Environmental Management Plan (CEMP)
- Operational Environmental Management Plan (OEMP)
- Any other management plan specified in the EIS or conditions of consent (if approved)

The management plans will address all requirements specified in the EIS and supporting documents, as well as any consent conditions (if approved). These plans will provide documented requirements for performance measures and monitoring during each stage of the project.

Performance will also be monitored through the outcomes of consultation during all phases of the project. Monitoring community feedback and concerns are key to assessing the performance of management strategies.

3.5 LIMITATIONS/ASSUMPTIONS

This LUCRA has relied on the following information to evaluate potential land use conflicts:

- Observations made from existing operations onsite
- Consultation undertaken by The Comms Team
- Desktop research and mapping of the site and locality.

The following limitations apply to this LUCRA:

- Mitigation measures from the EIS and supporting impact assessments, where implemented effectively, are likely to reduce the risk of potential land use conflicts. However, the implementation of mitigation measures may not reduce the risk of all potential land use conflicts.
- The identification of land uses and conflicts within this LUCRA is restricted by the detail and number of responses received during consultation. There is potential for other land uses and conflicts, not previously identified, to occur within the locality.

4. CONCLUSIONS AND RECOMMENDATIONS

This LUCRA has identified potential land use conflicts and evaluated their risk. The overall risk ranking (revised, to account for management strategies) for potential land use conflict ranges from low to moderate.

The were a total of 12 potential land use conflicts identified. The risk ranking identified 4 possible risk and 8 unlikely risk conflicts.

The average risk ranking of all identified conflicts was reduced from an initial risk ranking of 10.08 (moderate risk) to a revised risk ranking of 6.33 (low risk), The average revised risk ranking for all identified land use was below 12 which is consistent with the LUCRA objectives.

The effective implementation of management strategies is likely to minimise the risk of potential land use conflicts.

APPENDIX 1 MITIGATION MEASURES AP01

IDENTIFIED IMPACT	MITIGATION MEASURES AND MANAGEMENT MEASURES
BIODIVERSITY	The following mitigation and management measures are proposed to minimise the risks of any residual impacts: • Install sediment barriers and erosion control during construction to prevent runoff into adjacent vegetation. • Vehicles should be washed down before entering and existing the site to prevent the spread of weeds and pathogens to or from the development site and adjacent vegetation. Any weed outbreaks should be controlled during the project. • All staff working on the development will undertake an environmental induction as part of their site familiarisation. Site briefings should be updated based on phase of the work. This induction will include items such as: ○ Site environmental procedures (vegetation management, sediment and erosion control, exclusion fencing and weeds of national significance (WoNS) and priority weeds). • Erection of fencing along the boundary of retained vegetation and educational signage erected in key locations. • Conduct routine weed control in accordance with the VMP (Wildthing Environmental Consultants, 2024). • Erection of fencing along the boundary of retained vegetation and educational signage erected in key locations. The signage is to outline the environmental significance of the retained vegetation and list prohibited actions within the retained vegetation. • Implementation of a 15km/h speed limit, kangaroo warning signage.

ABORIGINAL CULTURAL HERITAGE	The following mitigation and management are proposed to minimise the risks of any residual rick to Aboriginal Cultural Heritage:
	• Following development consent of the project, the proposed work may proceed with caution. In the unlikely event that unexpected Aboriginal Heritage items are encountered during works, the *Unanticipated Find Protocol* (Appendix 3 of the ACHAR) must be implemented. Appendix 4 of the ACHAR provides the appropriate procedure to be undertaken in the unlikely event that human remains are encountered.
	• The ACHAR concludes that the project may proceed without further archaeological investigation under the following conditions:
	  ○ All land and ground disturbance activities must be confined to within the study area, as this will eliminate the risk of harm to potential Aboriginal objects in adjacent landforms. Should the parameters of the project extend beyond the assess study area, then further archaeological assessment may be required.
	  ○ All staff and contractors involved in the proposed work should undergo a cultural heritage induction to ensure they can recognise Aboriginal artefacts (Appendix 5 of the ACHAR) and are aware of the legislative protection requirements for all Aboriginal sites and objects under the NPW Act and are familiar with the Unanticipated Finds Protocol and the skeletal remains protocol.

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EARTHWORKS / GEOTECHNICAL	**CONSTRUCTION PHASE** • Undertake all earthworks, civil works and building works in accordance with the recommendations of the JK Geotechnics - Geotechnical Investigation dated 21 June 2024.
STORMWATER MANAGEMENT	**CONSTRUCTION PHASE** • Implement the Erosion and Sediment Control Plan as shown on MPN Plans 9883-SKC.04 – SKC.05. • Implement and maintain appropriate control measures to prevent sediment laden wastewater and other potential pollutants such as oil, paint and wet concrete from entering the stormwater system via stormwater drains and gullies, including: – Limitation of site access during construction to minimise disruption to traffic. Install a temporary construction entry/exit sediment trap at all site accesses to minimise mud and sediment from the site being tracked onto public road, particularly during wet weather or when the site is muddy. – Install and maintain appropriate sediment fences around construction areas. – Divert clean stormwater runoff, using catch drains, around construction areas to existing or new stormwater drainage system. – Install sandbags and other pollution containment devices around stormwater drains and any other locations where required to prevent sediment entering the trunk stormwater system. – Cover open earth/soil areas progressively (with concrete slabs and pavements or mulch) to minimise areas of bare earth/soil. – Any stockpiles of excavated soil and demolition/construction waste must be located where risk of erosion and sedimentation is minimal and must be protected from wind and water erosion. – Implement and maintain appropriate control measures such as catch drains and sediment fences to prevent ponding of stormwater or discharge of stormwater from the site to adjacent properties. – Provision of spill/pollution control equipment that is readily accessible to clean up spills and leaks. – Ensure spill/pollution control measures are available and maintained in working condition. – Sediment contained by the sediment control devices such as sandbags, sediment fences and containment bunds must be frequently removed and placed in a controlled area. – Implement an inspection schedule for any spill or leaks of any potential polluting areas or activities. **OPERATIONAL PHASE** • Construct the Stormwater Management Plan as shown on MPN Plans 9883-SKC.01 – SKC.03.
AIR QUALITY	**CONSTRUCTION PHASE** • With regard to the timing of water truck use during construction, the primary dust management trigger should be visible dust with the potential to leave the site. If dust from the site is observed which has the potential to leave the site, watering should immediately occur. • Other measures such as rehabilitation of exposed areas and minimising the area of the site exposed should also be included as part of site management.

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	OPERATIONAL PHASE **To ensure continual compliance and reduce the risk of dust and odour nuisance, the ongoing management which should consist of:** • ensuring that the entry and exit doors for the intake building are kept closed at all times unless vehicles are entering or exiting; • cleaning up any grain spills on site as soon as identified. Cleaned up grain should be stored in covered waterproof containers before being removed offsite. • maintenance of dust filters or cyclones in the mill to manufacturers specifications; • keeping roadways and paths in the mill clean and tidy; • road management: - use of sealed surfaces; or - treatment of the external road surface used by heavy vehicles to stabilise the roads; and/or - if required, watering of the roads and/or open areas; • limiting vehicle speeds during conditions where dust emissions have the potential to be higher than normal due to dry or windy conditions; • revegetating disturbed areas around the mill which are not required for vehicle traffic or operations.
NOISE	**CONSTRUCTION PHASE** **Noise Monitoring Program:** • Iti is recommend that attended noise monitoring is to be carried out at commencement of each process/activity that has the potential to produce excessive noise. Attended monitoring offers the advantage of immediate identification of noise exceedances at the receiver and ameliorative action required to minimise the duration of exposure. Unattended long-term monitoring only identifies a problem at a later date and is not recommended. **Acoustic Barriers / Screening:** • To minimise noise impacts during construction, early work are to concentrate on grading and levelling the areas in unshielded locations. In the event of complaints arising from residents, we offer the following additional strategies for consideration: – Place acoustic enclosures or screens directly adjacent to stationary noise sources such as compressors, generators, etc. Expected noise reductions for individual items ≥5dB(A). **Consultation / Complaints Handling Procedure:** • The construction contractor must analyse proposed noise control strategies in consultation with the Acoustic Consultant as part of project pre-planning. This will identify potential noise problems and eliminate them in the planning phase prior to site works commencing. • Occupants of adjacent properties are to be notified of the intended construction timetable and kept up to date as work progresses, particularly as work changes from one set of machines and processes to another. In particular, occupants are to understand how long they will be exposed to each source of noise and be given the opportunity to inspect plans of the completed development. • Programming noisy activities (such as earthworks) outside critical times is to be considered.

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	• We recommend that construction noise management strategies are to be implemented to ensure disruption to the occupants of nearby buildings is kept to a minimum. Noise control strategies include co-ordination between the construction team and residents to ensure the timetable for noisy activities does not coincide with sensitive activities. • The site manager/environmental officer and construction contractor are to take responsibility and be available to consult with community representatives, perhaps only during working hours. Response to complaints or comments are to be made in a timely manner and action reported to the concerned party. • All staff and employees directly involved with the construction project are to receive informal training with regard to noise control procedures. Additional ongoing on the job environmental training is to be incorporated with the introduction of any new process or procedure. This training will flow down contractually to all sub-contractors. **OPERATIONAL PHASE** • An acoustic mound or barrier is to be erected on the side of Loop Road to the north of Intake Building with a minimum height of 3000mm above finished ground level. • The site may operate 24 hours day. Monday to Sunday. • Speed restriction signs are to be erected at regular intervals along all access roads limiting site speed limits to the following: – 24 hours per day: 20km/hr Access road east of weighbridge – 24 hours per day 10km/hr: All site locations west of weighbridge • No acoustic treatment is required for mechanical plant in exposed locations that satisfy the following noise emission limits prescribed in the Acoustic Assessment. • If noise emissions from exhaust plant in exposed external locations exceed the limits shown above, acoustic barriers must be constructed to enclose the fan discharge. • If noise emissions from individual items of air conditioning, refrigeration plant, compressors or pumps in exposed external locations exceed the limits shown in Item 4 above, acoustic barriers must be constructed along 3 sides towards any residences. • The contractor responsible for supplying and installing mechanical plant must provide evidence that installed plant meets this noise emission limit, or that noise control included with the plant is effective in reducing the sound level to the specified limit. Once the plant layout has been finalised, details should be forwarded to the acoustic consultant for approval. • All external doors to the bagging shed and feed mill must be shut at all times during the evening (6pm-10pm) and night (10pm-7am). • All external doors to the intake building must be shut during the evening prior to emptying trucks, i.e. the north doors are to be shut prior to the truck entering, the truck is to drive into the intake building and the south doors shut prior to unloading, once unloaded the north doors are opened to allow the truck to exit the intake building. • Only one (1) truck is permitted on site at night (10pm-7am) i.e. west of the weighbridge, during a single 15-minute period. • The intake building is only to be used during the day and evening from 7am-10pm, i.e. no use at night (10pm-7am). Exceptions are permitted on occasion

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	during busy periods, providing no more than one (1) truck is on site during a single 15-minute period. • All access roads should be kept in good condition, i.e. no potholes, etc. • Trucks and other machines should not be left idling for extended periods unnecessarily. Machines found to produce excessive noise compared to industry best practice should be removed from the site or stood down until repairs or modifications can be made. • A regular maintenance schedule should be adopted for all mobile and fixed plant items. Items found producing high noise should be stood down until repairs are completed. • A noise monitoring program, during commissioning, or in the early life of the site is recommended. This program will verify our predictions and in the unlikely event that complaints may arise, enable noise control strategies to be implemented, where required. Initial commissioning attended monitoring during the day, evening and night at potentially affected residential receivers.
HAZARDS	• The Dangerous Goods requirements of the *NSW Work Health and Safety Regulation 2017* shall be complied with (i.e., preparation of risk assessments for storage and handling of minor quantities of hazardous materials, etc.) • An audit of the dangerous goods storage design to be undertaken for compliance with relevant Codes and Standards, prior to construction of the DG storage are, e.g., Separation distance between Class 3 and 8. • Confirm that the distance between the proposed transformer location and any building/ structure comply with the requirements of Table 6.1 of AS 2067:2016. An extract of this is provided in Table 4-2. • The transformer should be in a bunded area to contain a potential pool fire due to loss of containment of transformer insulating liquid (C2). This will also prevent environment contamination as well as offsite impact. • Maintain adequate separation distance, minimum 1 meter or a vapour barrier, between the Workshop and Warehouse Office common wall. This will prevent escalation of a fire event initiated from the Workshop and vice versa. • The safeguards outlined in Table of Appendix A - Hazard Identification shall be implemented including but not limited to: – Provision of adequate personal protective equipment (PPE) for the handling of DG, e.g., chemical gloves, eye protection. – Provide adequate First Aid Kit. – Provide adequate fire protection system as per the requirement of AS and BCA, etc. – Provide designated smoking area. – Operator should be trained and competent. • Fire protection system and essential safety measures (ESM) shall be routinely tested as per the relevant Australian Standard. e.g., AS1851:2012. • An Emergency Response Plan (ERP) and Emergency Services Information Package (ESIP) shall be prepared in accordance with HIPAP No. 1. • To mitigate the potential for dust accumulation, all dust generating areas shall undergo regular housekeeping practices as per the Hazardous Area Classification (Dust) Assessment. • Implement regular housekeeping practices for the prevention and build-up of dust as per the Hazardous Area Classification (Dust) Assessment.

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	• Establish and maintain hazardous areas classification (dust) as per the Hazardous Area Classification (Dust) Assessment. • Equip the facility with dust sealed machinery to contain hazardous dust clouds. • Install suitable dust extraction systems as the identified dust release points.
BUSHFIRE	**Asset Protection Zone** • Prior to the issue of an Occupation Certificate for the development, an Asset Protection Zone is to be provided for the location and extent as shown on Figure 9 (of the BFAR) and to the standards outlined in the BFAR . The APZ is to be maintained in perpetuity in accordance with these requirements. **Access** • Prior to the issue of an Occupation Certificate for the development, the property access road is to be constructed to comply with the following requirements and is to be maintained in accordance with the following requirements in perpetuity: - ensure the road is suitable for two-wheel drive vehicles and for all weather access, - access is provided to all structures, - traffic management devices are constructed to not prohibit access by emergency services vehicles, - access roads must provide suitable turning areas in accordance with Appendix 3 of PBP, - the capacity of road surfaces is to be sufficient to carry a fully loaded fire fighting vehicle (up to 32 tonnes), - bridges and causeways are to clearly indicate load rating, - hydrants are located outside of parking reserves and road carriageways to ensure accessibility to reticulated water for fire suppression, - hydrants are provided in accordance with the relevant clauses of AS 2419.1: 2021, • the property access road is to have: - a minimum 6m wide road carriageway width, - Vegetation above the road is clear to a height of 4m above it, - curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress, - the minimum distance between inner and outer curves is to be 6m, - Gradient of the access road is not to exceed 15 degrees (sealed road) and 10 degrees (unsealed road), and - Crossfall of the access road is not to exceed 10 degrees. **Water Supply** • Prior to the issue of an Occupation Certificate for the development, the development is to be connected to the reticulated water supply system and is to be maintained in perpetuity. • Prior to the issue of an Occupation Certificate for the development, evidence shall be provided to demonstrate that the fire hydrants are designed and installed in accordance with the following and the National Construction Code requirements, and are to be maintained in perpetuity: - Fire hydrant spacing, design and sizing comply with the relevant clauses of AS 2419.1: 2021, - Hydrants are not located within any road carriageway,

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	- Fire hydrant flows and pressures comply with the relevant clauses of AS2419.1: 2021. • Prior to the issue of an Occupation Certificate for the development, evidence shall be provided to demonstrate that the water supply system for the development is designed and installed in accordance with the following and is to be maintained in perpetuity in accordance with these requirements: - All above-ground water service pipes external to the building are metal, including and up to any taps. **Electricity Services** • Prior to the issue of an Occupation Certificate for the development, evidence shall be provided to demonstrate that the electricity connection to the development is underground. Where this cannot be achieved, the above ground electricity transmissions lines are to be designed and installed in accordance with the following and is to be maintained in perpetuity in accordance with these requirements: - short pole spacings are to be providing (i.e. less than 30m), and - no part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines. **Gas Services** • Prior to the issue of an Occupation Certificate for the development, evidence shall be provided to demonstrate that gas supply (reticulated or bottled) for the development is designed and installed in accordance with the following and is to be maintained in perpetuity in accordance with these requirements: - installed and maintained in accordance with AS 1596:2014 and the requirements of relevant authorities, - Metal piping is to be used for all connections to and from the cylinders/gas connection. No Polymer sheathed flexible gas supply lines are to be used adjacent to the building, - Fixed cylinders are to be kept clear of flammable materials to a distance of at least 10m, and - Fixed cylinders are to be shielded from the hazard. **Landscaping** • Prior to the issue of an Occupation Certificate for the development, evidence shall be provided to demonstrate that the landscaping for the development is designed and installed in accordance with the following and is to be maintained in perpetuity in accordance with these requirements: - Any landscaping is to be undertaken in accordance with guidelines provided in Appendix C of this report, - A clear area of pavement is maintained adjacent to the buildings, - All fences are to be made of either of hardwood or non-combustible material. Where the fence is within 6m of a building or in areas of BAL-29 or greater, the fence is to made of non-combustible material only. • Trees and shrubs are located so that: - the branches will not overhang the roof; - the tree canopy is not continuous; and - any proposed windbreak is located on the elevation from which fires are likely to approach. **Emergency Evacuation Plan**

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	• Prior to the issue of an Occupation Certificate for the development, a Bush Fire Emergency Management and Evacuation Plan is to be prepared for the development in accordance with: - The NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan, and - Australian Standard AS 3745:2010 Planning for emergencies in facilities, • And is to incorporate the following: - An Emergency Planning Committee is to be established and is to consult with residents and staff in developing and implementing an Emergency Procedures Manual, - Detailed plans of all emergency assembly areas, including on site and off-site arrangements, as stated in AS 3745:2010 are clearly displayed, and an annually emergency evacuation is conducted. • A copy of the Bush Fire Emergency Management and Evacuation Plan is to be provided to the Local Emergency Management Committee for its information prior to occupation of the development.
WASTE	• Implement the existing waste management actions documented in the Environment Operations Management Plan Prepare and implement a Site Based Waste Management Plan consistent with Baiada's Australian Packaging Covenant Action Plan.
CONSTRUCTION MANAGEMENT	• Prepare and implement a Construction Management Plan to ensure the potential impacts associated with the construction phase are appropriately mitigated and managed. • The construction management plan will include the requirements for project updates and a procedure for receipt of feedback from the community and first nations groups including provision of a response.
ENVIRONMENTAL MANAGEMENT	• Prior to issue of an Occupation Certificate, updated and implement the Environment Operations Management Plan for the site.
BIOSECURITY	• Operate the feed mill in accordance with the following documents (as amened); - *National Biosecurity Manual for Feed Mills* (V1) SFMCA, 2021 - *Australian Code of Good Manufacture Practices for the Feed Milling Industry*. - *Baiada's National Biosecurity Manual*. - *Baiada's National Feed Mill Biosecurity Manual*

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