

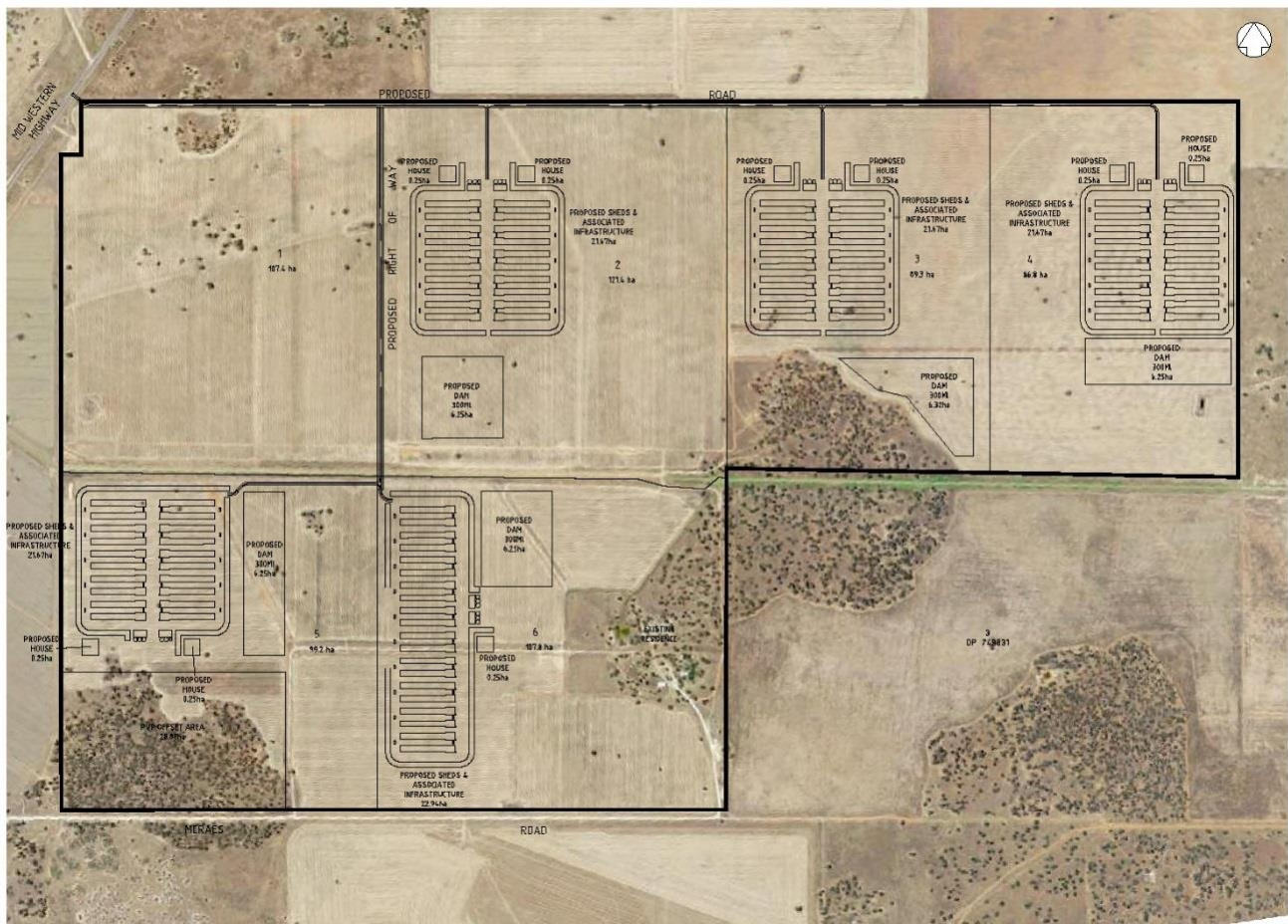
GOOLGOWI POULTRY COMPLEX

LOTS 1 & 2 DP 749831

375 MCRAES ROAD, CARRATHOOL

**RESPONSE TO AGENCY
AND
PUBLIC SUBMISSIONS SSD 8036**

December 2018



DEVELOPMENT CONSULTANTS IN ENGINEERING, SURVEYING, PLANNING & ENVIRONMENTAL



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This Response to Submissions report has been prepared by Tattersall Lander on behalf of Muscat Developments Pty limited to respond to all submissions and clarifications of submissions received following public exhibition of the EIS for the proposed Goolgowi Poultry Farms. The responses are tabulated below with groupings relating to specific Agencies or individuals with specific clarifications relating to each issue raised, however, the following general comments are relevant:-

1. General Issues

a. Department of Planning **i. Development Staging**

- a. Expected timeframe for Stage 1 (Farms 3 and 4), whilst somewhat market driven and specifically processor controlled, would see commencement of the production sheds 2020 and completion 2022. Note that the servicing of the land with electricity and bulk earthworks etc would commence 2019. Farm 3 would be initially the first complex constructed and Farm 4 would be then bought online at an appropriate time.
- b. Construction of Stage 2 (Farms 2, 5 and 6) is again subject to market demands and processor approval but it is expected that these Farms would be constructed in the following order as a continuing operation from Stage 1, Farm 2, Farm 6 and then Farm 5. Operationally, the retrofitting of ventilation stacks would be coordinated so that the stacks were operational on Farms 3 and 4, prior to the placement of day old chicks into Farm 2.
- c. It is expected that there will be around two (2) years between the commencement of poultry growing operations between each farm. Stage 2 will be a continuation of Stage 1 completion. Whilst caution is expressed at the indicative timings due to market demands and processor controls, the following poultry farming operations would/could be expected to come online:-

Table 1 – Expected Farm Commencement Dates

Farm No	Poultry Farming Commencement Date
3	2020
4	2022
2	2024
6	2026
5	2028

ii. Air Quality and Odour

Please refer to a copy of the email from Carrathool Shire Council. Council has indicated that their records generally do not relate to rural areas. However, they could not find any definite records of recent dwelling construction in the vicinity of the development site. Council has indicated that there are dwellings in the vicinity of the development but these dwellings have already been identified in the Odour and Noise Reports by Advitech Environmental.

It is therefore concluded that all known residential properties in the vicinity of the development have been adequately identified and have been appropriately included in all relevant reports.

iii. Farm Operations

- a. The length of time between shed cleanout and bird placement is somewhat variable but the industry standard is two (2) weeks. The minimum time for smaller farms is around seven (7) days but given the size of the operations in this Application, a 2-week break would be needed to clean out, sanitise, air and re-establish fresh litter into the sheds.
- b. Wheel washes are considered as a Construction Certificate issue but each farm will install their own facilities as part of their own biosecurity operations. The layouts have been designed to allow each farm independent operational control of their own activities.
- c. Public submissions relating to the expected conflict interaction between farming operations and school bus movements is misplaced. The existing intersection accommodates a passing lane that operates without concern and the proposed entry/exit to the facility will have its own slowdown lane. Assuming that the majority of the farming operations traffic will go past the Green Hills Road school bus intersection, the following maximum impact possibility would be expected:-

There are about 500 vehicles/day using the highway with around 160 of those vehicles being trucks. This currently equates to around one (1) truck/ 9 minutes assuming an even distribution of truck movements over the day. The proposed increase is calculated using only day time operations as the school bus would not operate at night time. During the day time, the arrangements are feed trucks at 4 per day (8 movements), waste removal assuming 100% during the day equates to 100

movements over a few days every 2 weeks but only 50% going past the intersection equates to 50 movements, restocking and Fuel/LPG at 2 per day (4 movements), litter deliveries assuming 100% during the day equates to 5 per day (10 movements but averages 1 per day or 60 per batch). Total number of movements is 64 per day. Adding this number to the background truck movements would see a heavy vehicle going past the Green Hills Road intersection at around one (1) truck/5 minutes.

This is at the peak truck movements; however under normal operations of the whole farming activity this figure drops to 28 movements/day equating to around 1 truck/ 7 minutes past the intersection.

It is expected that this additional frequency of truck movements will not cause conflict but in saying this, there will be significant future dialogue between the project operations, the local community, Council and the local bus companies to ensure that these sorts of issues of potential conflict do not occur. As an additional note it is expected that children from the poultry farming operations would also be needing access to these same bus services and therefore local resident's concerns are considered unfounded.

It is not intended that any additional Community consultation is needed or warranted on this matter.

iv. Water Supply, Demand and Management

- a. Prior to the operational use of the proposed dams, the dams will have geotechnical advice provided regarding the requirements to generally seal the dam. It is not quite understood what the concern is here but the water supply for the dam storage is from the Wah Wah Channel which is in itself a unlined supply channel. Leaching from the channel does not appear to be impacting the groundwater and an active Murrumbidgee Irrigation monitoring bore within the property has yet to record any groundwater at all and will be decommissioned as part this development. The supply dam has been designed as a turkey nest dam that will contain all rainwater for reuse back into the sheds. Birds do not access any part of the farm outside the sheds so the idea that significant pollution could be introduced to the groundwater is misplaced.

Monitoring of groundwater should not be required given that the Wah Wah Channel is unlined and is adjacent to the proposed operations. Discussions with Murrumbidgee Irrigation 17th May 2018 has indicated that both monitoring bores can be removed and will not be replaced

as they are excess to Murrumbidgee Irrigation's requirements and that DoI Water, their regulator, has approved their removal.

- b. It is confirmed that the post development water re-use volumes are expected to be the same as the water take from the Wah Wah Channel.
- c. Discussions with Murrumbidgee Irrigation on the 17th May 2018 has indicated that the Wah Wah Channel automation refurbishment will take around 5 months to be completed and be undertaken in 2018. Given that the poultry operations will not commence until 2020 there will be available water from the refurbished channel when required. Murrumbidgee Irrigation has provided a Public Notice regarding these automation upgrade works and this document is attached.
- d. The land currently has a Rights of Access Certificate for 1645ML. In discussions on the 17th May 2018 with Murrumbidgee Irrigation the advice was that the farm is ideally sited to be serviced by them and that the current allocation will be sufficient for poultry production. At this moment we are not seeking to convert any of the current allocation of general security water to high security but if this was necessary Murrumbidgee Irrigation will still be the supplier and there is an existing market mechanism for this to occur. Murrumbidgee Irrigation has indicated that if the water licence was fully converted to high security they would have no problems servicing that requirement.

Significant improvement in water quality and quantity will be provided in the underutilised supply channel with the development and the upgrade works and this will benefit all adjoining users of the supply.

- e. At this time there is no existing groundwater bore in use on the land. A test bore is currently being installed to determine groundwater depth and quality but local knowledge is indicating that the groundwater will be too salty for poultry bird production. Groundwater is not being considered for any part of the proposed operations.
- f. Each dwelling has a 5KL tank. The plans do not show water tanks for the dwelling only the 500KL reservoirs for the poultry sheds. Given that the dwellings will be moveable dwellings such servicing of the dwelling will be installed when the building is installed.
- g. Figure 12 of the Water Quality Report is finalised and cannot be amended. The reason for the flat line is that there is no outflow from the dam. Whilst this may be difficult to understand Table 6 indicates the

relevant post runoff is zero and the capacity of the dam is sufficient to fully contain a 1% event even when the dam is at its maximum designed capacity.

v. Waste and Wastewater Management

- a. Sheds have spent litter removed and are then washed down with sanitisers using water and high-pressure hoses. The sheds are locked up (sealed) for 24-48 hours then opened to dry out over a period of about a week. Note that the air conditioners fitted to each shed are occasionally used in this drying process. Wash down water is fully retained within the shed where it evaporates and at no time is this water permitted to be discharged to the dam or to the environment.
- b. The volume of water used in the cleaning of each shed is contained in Appendix A of the Water Quality Report and it is 8000lts/shed.
- c. Typically, each shed will produce around 250m³ of spent litter /batch/shed and this equates to ~100 tonne. This means that that each farm will produce around 2000 tonnes and the five (5) farm development would produce 10,000 tonnes per batch cycle.

From a percentage point of view, the majority of animal mortalities occur within the first week after delivery of the one-day old chicks. Approximately 1% is lost in the first week and over the next 7 weeks, losses would be expected to significantly reduce on a daily basis and to maximise to ~4^{1/2}% of the overall batch numbers. There are variations between bird types and their mortality rates but the above figures are industry indicative. This would mean that ~54,000 mortalities would be composted over a batch per farm. It should be noted that after these daily mortalities are composted they are removed from the composting shed as litter when the next batch shed cleanout is undertaken.

There is no requirement for an ancillary resource recovery facility or rural industry use to handle the usual poultry farm practice of composting daily mortalities and transporting large volumes of spent litter. Currently there are exemptions under the POEO (Waste) Regulation 2014 with a Compost Order 2014 and a Compost Exemption 2014 for this much sort after agricultural resource.

- d. Leachate management for the Composting Shed is a non-issue. The shed provides a sealed base and structure so that the generally aged (dry) litter is not subjected to rain or outside moisture events. The Composting Shed will be designed and operated as per DPI Storing

Poultry Litter Module 2 Manual. Leachate from such a structure and operation is evaporated out.

vi. Farm Manager Accommodation

- a. The existing dwellings are not part of the Application and no decision has yet been made if they are to be demolished or refurbished. It is however more than likely that will be refurbished to provide farm accommodation so that the residue of the land can be appropriately managed whilst the initial poultry operations are being constructed. Long term arrangements with these structures will be subject to minor local Applications to Carrathool Shire Council.
- b. The proposed accommodation on each farm will be a dual occupancy as defined in the Carrathool LEP 2012.
- c. The dwellings will be moveable dwellings and accordingly floor plans and elevation plans are not required.

vii. Broiler and Farm Supplies

- a. Broiler day old chicks are supplied to each farm by the processor from a local Riverina breeder farm. Mature birds are collected by the processor and processed at the Hanwood Processing Plant. Feed deliveries are again provided by the processor from a local feed mill.

viii. Clearing, Earthworks and Erosion and Sediment Control

- a. Each farm operation has been designed to be a simple cut fill operation. Material from each dam is to be used to floodproof the operation and to build the necessary acoustic mounds and pads. Specifically, the bulk earthwork volumes for each farm are indicated below:-

Table 2 – Farm Bulk Earthworks Volumes

Farm	Cut/Fill Bulk Earthwork Volume (m³)
2	362,907
3	389,159
4	336,141
5	362,763
6	344,700

- b. Refer attached plan for the typical erosion and sediment controls and note that the main dam will be the source of all required fill and act as the construction sediment basin for the construction operations.

ix. Services and Utilities

- a. Power Line Design Pty Ltd, the project electrical designers, have received the design package from Essential Energy and the following details has been advised as being the Essential Energy requirements:-

- Approximately 24km of 3 phase 33kV from connection point to site
- Installation of Auto recloser
- 3 tank 100A voltage regulator
- 5 x 1000kVA padmounts fitted with circuit breakers
- 50mm single core 33kV cable
- Full planning study by Essential Energy

Further work on the reticulation of electricity is currently on hold waiting for the approval process to be substantially completed. However, it is envisaged that the reticulation of 3 phase power to the site will be completed during the bulk earthworks phase for Farm 3 and then each individual farm will be connected as each farm is developed.

- b. The electrical network has yet to be fully designed, however it is logical that the main supply will be strategically located to suit the current Essential Energy network and power would then be reticulated to each of the 1000kVA padmounts that will distribute usable power to each farm. Note that this upgrade of the electrical network in this area will have significant positive adjoining impacts on electrical reliability for existing agricultural activities in the local area.

x. Management and Mitigation Measures

Matters addressed in tabulated responses below.

xi. Additional Matters

With respect to other Agency or Authorities as well as individual submissions these are tabulated below.

As regards the Preliminary Hazard Assessment (PHA) that has been undertaken in accordance with the SEAR's issued for this project and in detail has investigated the

following documents and requirements and it should be noted that the storage of Dangerous Goods has been amended to include sodium hypochlorite (Pool Chlorine) with the storage criteria below relevant required thresholds:-

Table 3 – Farm Stored Dangerous Goods

Component	Dangerous Goods Class	Amount Contained on Site	Threshold Quantity	Relativity SEPP 33 Threshold
LPG	2.1	2 x 37.5 cubic metres per farm complex	16 cubic metres (above ground storage)	Above
Petrol	3	Maximum of 2.5 tonnes/ farm complex	4 tonnes	Below
Diesel	Not Applicable	Maximum of 9,000 litres/farm complex	Not Applicable	Not Applicable
RoundUp (Glyosphate)	Not Applicable	20 Litres per farm complex	Not Applicable	Not Applicable
Sodium Hypochlorite (Pool Chlorine)	8	400 litres/farm complex	Not Applicable	Not Applicable

1. HIPAP No 4 – Risk Criteria for Land Use Safety Planning, this document specifically relates to the mitigation of conflict from the introduction of a potentially hazardous development on adjoining land uses. The proposed development is being undertaken in a highly isolated location well away from any physically intensive occupation of land and only broadacre rural lands undertaking extensive agricultural activities are adjoining. The location of each farm is self-contained and is again isolated from any adjoining poultry farming operation. Installation of the gas tanks comply with Australian Standard 1596-2014 – The Storage and Handling of LP Gas ensuring compliance with the requirements of the strategic aims and objectives of HIPAP No 4.
2. HIPAP No 6 – Hazard Analysis, this document seeks to provide a comprehensive analysis of the threat to persons operating the facility as well as quantifying the impacts on the biophysical environment from a catastrophic failure and the likelihood of that occurrence. It further investigates the potential impacts on adjoining land uses.

Again, the installation of the gas tank array in accordance with the Australian Standard 1596-2014 will achieve compliance with the strategic aims and objectives of HIPAP No 6. The detail on the attached plans are specific and at a Construction Certificate level of documentation for the gas tank installation.

With respect to the requested additional information and clarifications, the following advices are provided:-

- Amended plans highlight the location and operational aspects of the gas tank arrays for each farm. The gas tank arrangements have been prepared utilising an Origin Energy (the preferred supplier of the tanks and gas supply) standard layout plan.

For each farm the gas tanks will be located in two (2) locations each location having 5 tanks. Each of the gas tank arrays will be the same for all farms and there will be no variations between the farms. A detailed plan indicates the location of the gas tanks and notes that AS 1596-2014 requires clearance of 9.5m from a tank to a public place and this is interpreted as being a poultry shed. A distance of at least 9.7m is available. Refilling distances required for the LPG Unloading Bay are required to be at a minimum of 6m from the tanks with 9.0m being made available.

The specifics of this arrangement are clearly indicating compliance with the Australian Standard and this level of compliance is further validated by the supplier and owner of the tanks being Origin Energy. No part of the installation of the gas tanks is at variation to the usual operational aspects of such an installation and the proposal is expected to be a normal operational issue for the supplier as well as the farm operator.

- With respect to the various Dangerous Goods contained within the property, the following table indicates the relevant details requested in point 2 of the request for information. As regards the use of sodium hypochlorite (Pool Chlorine) within the farm, this is used as a water sanitiser to maintain bird health and to limit water borne pathogens impacting on biosecurity. The pool chlorine is injected into the water mains supplying the water to the sheds.

Table 4 – Dangerous Good locations and Operational Hazards and Safeguards

Component	Amount Contained on Site	Storage Locations within the Farm	Operational Hazards	Operational Safeguards	Expected ramifications / consequences
LPG	2 x 37.5 cubic metres per farm complex	2 x 5 x 7,500ltr tanks located in separated locations within the farm	Catastrophic Vessel Failure with direct flame on tanks, fittings. Farm vehicles	Separational distances as per the Australian Standard As 1596-2014. Vessels to be fitted with pressure release valves, isolation valves and pump	Low – proposed facilities will be serviced by the supplier on a regular basis. Facilities are compliant

			crashing into the facility	shutoffs. Location provided with fire hose reels. Facility protected by standard bollards.	with the Australian Standard.
Petrol	Maximum of 2.5 tonnes/ farm complex	Storage Shed – single tank	Catastrophic Vessel Failure	Containment in a bunded area. Fire extinguishers available. Spillage kits available	Low – typical arrangement for all rural properties.
Diesel	Maximum of 9,000 litres/ farm complex	Storage Shed – single tank	Catastrophic Vessel Failure	Containment in a bunded area. Fire extinguishers available. Spillage kits available	Low – typical arrangement for all rural properties.
RoundUp (Glysophate)	20 Litres per farm complex	Storage Shed	Spillage from drum during decanting into spray equipment.	Containment in a bunded area. Spillage kits available	Low – typical arrangement for all rural properties.
Sodium Hypochloride (Pool Chlorine)	400 lts/farm	20lts to be located in the pump room for injection into the water supply lines. 380lts ((19 x 20lts drums) to be stored in storage shed.	Spillage from an overturned vessel (max 20 lts) inside pump room. Spillage from 19 x 20lts drums in storage shed	Containment in a bunded area. Spillage kits available Containment in a bunded area. Spillage kits available	Low – typical arrangement for poultry farms.

- The attached plans indicate the relevant separation distances from buildings and lot boundaries from the storage locations of all Dangerous Goods including the relevant Class 3 dangerous goods.
- The use of LPG is for the heating of the sheds. Heating of the sheds occur in the brooding phase of growing the birds or from a day-old chick to approximately 22 days old (and weather dependent). Each shed contains 5 heaters and the preferred unit is a Hired Hand Super Saver XL Heater. The LPG is supplied to the shed by underground reticulation to these small wall heaters that are automatically ignited by the sheds operational systems. At the beginning of bird placement only ¼ of the shed is heated and the day-old chicks are confined to the rear (away from the air conditioning end) of the shed. As the birds grow the remaining parts of the shed are sequentially made available for bird occupation.

The gas heaters are fitted with temperature-controlled switches so that gas cannot be released into the sheds and the heaters can only operate when

the gas has been ignited. Should a heater fail to ignite, alarms are triggered and automatic messages are sent to the shed managers and two (3 in total) other employees that equipment failures have occurred. The automatic monitoring of all parts of the shed operations with the relevant alarms for any mechanical or operational issues ensures that the sheds and all equipment are monitored on a 24-hour basis.

2. Responses to Agencies

a. Environmental Protection Authority

The EPA and Advitech had a teleconference on the 11th September 2018 to discuss and finalise the specifics for a revised air quality assessment. The updated report is included as Attachment 1 to this response with some details in the Table of Responses below.

b. Office of Environment & Heritage – Heritage Division

Minor clarifications and corrections have been made to the amended Heritage Report and this amended report is included as Attachment 2 to this response.

c. Office of Environment & Heritage – Biodiversity

Multiple issues raised by OEH that has been addressed in the amended BAM Report. Specific responses to individual items are addressed in the Table 5 – Table of Responses below. An electronic shape file has been included in this submission that needs to be transferred to OEH for their assessment of the BAR.

d. DPI Water

Water issues are addressed in detail in the Table of Responses below, however many of the issues raised appear to be based on the assumption that the Application will relate to impacts on groundwater. It is the intention of the proponent to utilise the available water supply from the Murrumbidgee Irrigation system with a storage facility located on each farm to supply all of the water needs for the farm for the next year. The storage dam will be lined and therefore isolated from groundwater.

Biosecurity issues and operating arrangements are also discussed in the specific tabulated responses.

e. Murrumbidgee Irrigation

Detailed discussions on the 17th May 2018 regarding the requirements for the decommissioning of the MI groundwater monitoring bores and the future water supply to the farms has confirmed the processes needed. MI has confirmed that refurbishment of the Wah Wah Channel No 5 will see an improvement in the quality of water in the channel as well as significant operational advantages for MI. The potential for the proposed development to also provide an improvement in water quality and to utilise out of sequence demands on the channel supply arrangements are matters that will be further discussed at the time of the commencement of the operations.

f. Rural Fire Service

Issues raised with respect to the installation of Assets Protection Zones and compliance with the PfBP 2006 as part of a Farm Management Plan are logical and appropriate for the development.

g. Roads & Maritime Services

Ongoing discussions with RMS have confirmed that the proposed operations will need to design all intersections with respect to this project to cater for a B-Triple vehicle. Whilst this geometry can only be catered for at the proposed new highway intersection (at the same locations as the existing farm access point) a variation to allow concurrent bulk earthworks with the highway intersection works is proposed. A separate intersection plan set has been prepared and is included as Attachment 4.

h. Transport for NSW

No comments and no issues raised.

i. Carrathool Shire Council

No comments and no issues raised.

Table 5 – Detailed Responses to Agency Submissions

Agency/Public	Issue(s) Raised	Response
Carrathool Shire Council	Council advised no comment on development.	Noted.
Environmental Protection Agency (EPA)	1. <u>Meteorological data utilised for dispersion modelling</u> The metrological data adopted for the AQIA has not been adequately demonstrated to be representative and may not provide a reasonable worst-case scenario, as the quality of low wind speed conditions may be underrepresented. In order to determine the most representative calendar year for modelling purposes, the assessment considers temperature and rainfall data between 2008 and 2015 from the Bureau of Meteorology (BOM) automatic weather station (AWS) at Griffith (075041). Since worst case odour impacts for ground level odour sources generally occur during calm/light wind conditions when odour dispersion is poor, it is important that calm/light winds are used as a metric in selecting a representative year. <u>Recommendation: Consideration should be given to other meteorological parameters such as wind speed and wind direction to demonstrate the appropriateness of the selected year for meteorological/dispersion modelling. The proponent must provide an analysis of</u>	Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20 th November 2018, refer Section 4.1 and Appendix V.

Agency/Public	Issue(s) Raised	Response
	<u>wind speed and wind direction from data from Griffiths AWS to demonstrate 2011 is appropriate for modelling purposes.</u>	
	2. <u>Modelling scenarios assessed</u> The modelled odour and particulate emission rates vary throughout the year and is dependent on the number of birds (or bird mass), the age of the birds and the ventilation rate. Emissions are estimated to increase through the cycle before decreasing upon the completion of the cycle. The assessment considers a single modelling scenario where all sheds are assumed to operate in a synchronised fashion. The modelling scenario assumed all sheds are stocked on day 1 of the year and follow a defined growth cycle. The modelling has not considered impacts of growth cycles starting (and progressing) at a different day of the year. The addendum to the EIS modelled an additional scenario where the operational phases of the farms were staggered, e.g. Farm 1 was stocked on day 1, Farm 2 was stocked on day 14 etc. Results indicated that staggering had very little impact on the ambient odour impacts. The effect on particulate impacts from staggering was not considered.	Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, refer list of modelling scenarios: Section 9.3 – Table 10. Results presented in Section 11.1.1 – Table 13 and Appendix IV- Table 22.

Agency/Public	Issue(s) Raised	Response
	Worst case impacts are considered to arise when all farms are operating in the same phase of the growth cycle, and peak emissions in the growth cycle occur during worst case meteorological conditions. On this basis, the staggering that was modelled in the addendum to the EIS is not considered to be worst case. The risk of potential off site impacts has therefore not been adequately assessed and characterised. A sensitivity analysis needs to be conducted to determine the worst case start date for day 1 of placement. <u>Recommendation: The proponent should conduct additional odour and particulate modelling for both Stages 1 and 2, with all farms operating at the same phase of the growth cycle, with the start date of day 1 of placement offset by 2 weeks then a further 2 weeks and then a further 2 weeks to determine the worst case odour and particulate impacts for the project. The maximum 99th percentile odour concentration and 100 percentile particulate concentration predicted at the surrounding sensitive receptors over all model runs is then used to assess the compliance of the project with the relevant impact assessment criterion.</u>	

Agency/Public	Issue(s) Raised	Response
	3. <u>Ventilation rate and source parameters for dispersion modelling</u> <u>Minimum ventilation</u> The assessment assumes that from days 1 to 22, the ventilation system is operated under minimum ventilation mode, where each shed is ventilated by eight horizontal discharge chimney fans equally spaced along the length of the shed roof. The fans have been represented as point source emissions at a height of 4.6 metres with a constant horizontal velocity of 8 m/s. There is no justification for the 8 m/s velocity at discharge. Further, details of how the point source was modelled as a horizontal discharge point, and the assumed discharge temperature were not provided. <u>Tunnel Ventilation</u> After day 22 of the growing cycle, the ventilation mode transitions to “tunnel ventilation”, when air is extracted by 18 exhaust fans per shed, providing a maximum ventilation rate of approximately 175m³/s for each shed. In both stages 1 and 2, emissions from tunnel ventilation were modelled as point sources to account for thermal buoyancy in plumes emitted from each shed. In stage 1. Odour emissions were modelled	Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, refer Section 8.1 and Section 9.4.

Agency/Public	Issue(s) Raised	Response
	assuming a horizontal release of 8 m/s per fan at a height of 1.5 metres, and in stage 2, emissions were modelled assuming a constant vertical velocity of 15 m/s per fan, at a height of 10 metres. There is no justification for the 8 m/s or 15 m/s velocity at discharge. When the outside ambient dry bulb temperature fell below 22°C, ventilation rates were reduced to between 1% and 5% full capacity flow, by “switching off” some fans. When the outside ambient dry bulb temperature fell below 20°C, ventilation rates were reduced to a minimum ventilation rate of up to 70 m³/hr. The validity of these assumptions is not demonstrated for all bird ages. The assumed shed ventilation rates were not validated against measured ventilation rate data from existing sheds in the region to demonstrate it is suitable to estimate odour emissions from the proposed facility. The validation must be undertaken for a wide range of ambient temperatures. The proponent should note that Dunlop and Duperouzel (2014) collected a significant amount of ventilation rate data from mechanically ventilated poultry sheds and developed a model for predicting fan activity.	Advitech notes the data collected and used to develop the fan activity model was taken from sheds much smaller than the ones proposed in Goolgowi. Largest shed in the study has 37265 birds and 1911 m² of floor area.

Agency/Public	Issue(s) Raised	Response
	<u>Recommendation: The proponent should provide the following additional information regarding the assumed ventilation rates and source modelling parameters:</u> • <u>Justification for the assumed constant discharge velocities of 8 m/s and 15 m/s;</u> • <u>Assumed temperature at discharge;</u> • <u>Details of how horizontal discharge was modelled;</u> • <u>Justification for the assumptions regarding changes in ventilation rate when ambient temperatures fall below 22°C and 20°C for all bird ages;</u> • <u>The variable emissions file;</u> • <u>Average bird density used in the calculations; and</u> • <u>Validation of the assumed ventilation rates against any site specific data or supporting design specifications. This validation is to include a detailed analysis of the assumed ventilation rates such as variation with bird age and ambient temperature.</u> 4. <u>Uncertainty regarding cumulative odour impacts</u> Odour dispersion was modelled from the Jeanella poultry facility, using parameters provided in the Jeanella AQIA. It is not	The PTMARB variable emissions file was used to represent the poultry shed emissions. This file is too large to be included. The average bird density varies with time as the birds increase in weight and decreases when bird thinning occurs. The bird density is assumed to remain constant for any given day. Modelling has been completed as recommended by EPA and odour impacts are similar to the Pacific Environment report. Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, results presented in Section 11.1.1 – Table 13 and Appendix IV – Table 22.

Agency/Public	Issue(s) Raised	Response
	clear whether the AQIA modelled the Jeanella site with 16 sheds or 40 sheds. A Monte Carlo simulation using odour concentrations from both the Jeanella and proposed facilities was then undertaken to determine cumulative impacts. Table 10 of the AQIA indicates that the background odour concentrations (from Jeanella) at residential receptors are less than 1.5 OU at all receptors. However, the Jeanella AQIA predicts an odour concentration at R2 (denoted R5 in the current assessment), from Jeanella operations only, is 6 OU. Although both assessments used different years for the analysis, (the current AQIA used 2011 data whilst the Jeanella AQIA used 2014 data) there was no discussion as to why results in the Jeanella AQIA differed substantially to the background concentrations calculated in the current AQIA. It is acknowledged that the maximum 99%ile concentrations can occur at different hours, but these hours would have been paired in a Monte Carlo Simulation. It is also unclear as to why Jeanella was not simply included as an additional source in modelling for the Goolgowi Farm. This would remove the need for a Monte Carlo analysis and provide more	

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	certainly regarding the potential cumulative odour impacts. <u>The proponent should revise the AQIA to include the 40 sheds at Jeanella as sources in the cumulative assessment.</u>	
	<u>5. The cumulative particulate assessment has not included particulate concentrations from nearby poultry facilities</u> Background particulate concentrations used in the AQIA were sourced from the OEH monitoring station at Wagga Wagga and Wagga Wagga North for the year 2011. Modelled particulate data from Jeanella was not included as background, although Jeanella is located 5km to the east of the proposed farm. <u>The proponent should include the Jeanella poultry facility as sources to include in the analysis.</u>	Modelling has been completed as recommended by EPA. Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, results presented in Section 11.1.1 – Table 13 and Appendix IV – Table 22
	<u>6. Particulate impacts of Stage 1 have not been modelled</u> The odour impacts of Stage 1 were considered in order to determine the maximum number of sheds without stacks that could be operated without causing exceedances. However, in order to confirm the maximum number of sheds that can operate without stacks, particulate emissions should also be modelled.	Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, and is included in Appendix IV.

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	<u>In order to confirm that stacks are not necessary in Stage 1, the proponent should model particulate impacts.</u>	
	7. <u>Exceedances in 24 hour average PM₁₀ ground level concentrations not mitigated</u> Modelling predicts exceedances in 24 hour average PM₁₀ ground level concentrations at three receptors. At each of these receptors the contribution due to the project is significant. Controls were proposed, however the modelling was not revised to demonstrate the controls can adequately mitigate the exceedances. <u>Recommendation: In accordance with Section 7.7 of the Approved Methods, the modelling should be revised to include various pollution control strategies until compliance is achieved.</u> 8. <u>Contingency measures for odour mitigation should be nominated</u> The <i>Technical framework – Assessment and management of odour from stationary sources in NSW</i> identifies that additional feasible odour mitigation measures that could be implemented should be considered at the assessment/planning stages of a proposal. The assessment does not identify or discuss additional feasible measures that could be adopted	Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, refer Section 13.2.1. Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, refer Section 13.1.2.

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	in the event odour impacts occur once the proposed facility is operational. <i>Recommendation: Additional feasible odour mitigation measures should be identified and included within the revised assessment.</i>	
	9. <u>Proponent has not assessed the odour risk of their project</u> There is considerable uncertainty inherent in an odour impact assessment. Compliance with odour assessment criterion is therefore just one tool that provides an indication of acceptable odour impacts. An understanding of the odour risk of a project enables the further assessment of the acceptability of any odour impacts. It is important for the proponent to understand the odour risk of their project as it is the proponent's responsibility to comply with <i>Section 129 of the Protection of the Environment Operations Act 1997</i>. Should odour impacts be experienced once a facility is operational the proponent will need to address these odour impacts and, if necessary, modify the facility based on actual operational outcomes. Addressing odour impacts retrospectively is likely to be more difficult and costly than incorporating such measures in the initial proposal.	Matter is now addressed in an amended Air Quality Impact Assessment by Advitech dated 20th November 2018, refer Section 13.1.

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	An assessment of odour risk involves putting the impact assessment result into context through the consideration of additional information. This additional information includes the robustness and appropriateness of the assessment input data, degree of compliance with the odour impact assessment criteria, results of any sensitivity analysis, the proposed odour mitigation measures and availability of additional feasible mitigation measures. Examples of additional information and how they inform the odour risk of a project are: • <i>Level of compliance with the odour assessment criterion at existing and future sensitive receptors:</i> marginal compliance with the odour assessment criterion indicates there is a risk the odour impacts may be unacceptable. • <i>Level of uncertainty in odour dispersion modelling results:</i> the use of the following data will increase the level of uncertainty in odour modelling results: ○ non site specific meteorological data ○ average instead of worst case odour emissions data	

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	• <i>Results of any sensitivity analysis:</i> a higher risk of unacceptable odour impacts would be a facility where a small change in any assumptions in the impact assessment results in a significant change in the predicted impacts. The sensitivity of the dispersion modelling predictions to the following could be investigated: odour emission rate, modelled source type and meteorological data. The sensitivity analysis could also be extended to include the influence of the above on the determination of the appropriate odour assessment criterion. • <i>Analysis of dispersion modelling predictions:</i> a statistical analysis of the predicted odour concentrations provides further information regarding the range and frequency of odour concentrations predicted to be experienced at nearby sensitive receptors. Statistical analysis that could be presented includes maximum, minimum, 99.9th percentile concentration, 95th percentile concentration and frequency distribution. • <i>Likely reliability and performance of odour mitigation measures:</i> unreliable	

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	and poorly performing odour mitigation measures would indicate the proposed facility presents a higher risk. • <i>Additional feasible mitigation measures that could be implemented if the facility emits offensive odour after it is operational:</i> a facility where there are no additional feasible odour mitigation measures is a high risk project compared to a facility where there are additional feasible odour mitigation measures that could be implemented once operational. <u>The EPA recommends the proponent evaluates the odour risk level of their project. The evaluation of odour risk must, as a minimum, consider the examples listed above. This information is important as it will demonstrate to the EPA the proponents' level of understanding regarding the odour risk of their facility and their obligation to comply with Section 129 of the Protection of the Environment Operations Act 1997.</u>	
Department of Industry – Lands and Water, Department of Primary Industries	Water Justify Dam Sizing	It is not clear why this operation needs to have to justify the sizing of its proposed independently operated sealed dam supply as it is a result of a cut/fill operation. The sizing of the dam is partly a result of the need to raise the production footprint above any regional flooding event and to store water for around two (2) years to be relatively independent from vagaries in rainfall and irrigation supplies. As shown in the Water Quality Report, Figure 12 and Table 7 indicate

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	Confirm Maximum Annual Water Takes Demands from Sources	that these dams will fully contain a 1% event even if the dam was at its maximum storage capacity. Each of the poultry farms will access water from the Wah Wah Channel No 5 for the majority of their water requirements. The supplier of this water is Murrumbidgee Irrigation. Stormwater from the facility footprint will be directed back into the main holding dam and reused in the sheds. No poultry shed water is intended to be sourced from site bores. It is not understood as to the term recycling other than the reuse of stormwater falling on the actual development footprint being fed back into the sheds. Minimal rainwater capture is proposed as the proposed treatment train is intended to partially clean the stormwater. The reservoirs are not located near the poultry sheds so the roof area of the sheds cannot be used as a direct supply into the reservoirs. It is intended to use the current allocated and held Rights of Access Certificate to 1645ML for the supply of this water. Table 5 of the Water Quality Report indicates that the take from stormwater has been calculated at 61.1ML/yr/farm and the additional requirements required to be supplied from Wah Wah Channel are 113.8ML for an average rainfall year.
	Additional Water Supply Infrastructure	Advice from Murrumbidgee Irrigation of the 17 th May 2018 has indicated that no additional requirements will be necessary for the supply of irrigation water to the farms at this moment. Given the proposed timing of the development of these farms, dialogue with MI will be undertaken well ahead of any actual supply requirement negotiations.
	Provide a Water Balance	Appendix A of the Water Quality Report details the water balance for the operations. Given that no ground water take is being proposed and only water supply from the Wah Wah Channel and reused stormwater are directed into a sealed turkey nest dam that does not

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		discharge to the environment, it is difficult to understand why there is a critical need to understand water availability long term for the project. The land has access to a combined 1645ML of water supplied by Murrumbidgee Irrigation. The dams have been sized to store approximately 2 years supply so that the farms can be operated independently of the local water cycle demands and climate impacts. Whilst the project adopted MUSIC to investigate pollutant loads, the program utilised an average of 11 years of 6 minute rainfall data between 1959 and 1970 for its calculations of water based pollutants off the site with an average of 413mm/year from Griffith BOM. Outputs from MUSIC allow consideration of water usage and availability on a monthly basis and these figures are contained within the report. Local Goolgowi BoM data validates the rainfall data but the local data is only provided on a monthly basis and for that reason, it was considered unreliable for the report. The driest year in Goolgowi was 1940 with 125.3mm and the wettest year was 1939 with 708.4. Impacts of low rainfall would see more take from the Channel and high rainfall would see significantly smaller takes from the Channel. As indicated above, the sizing of the dams has been arranged to permit the farms to store their required water for the next year's production cycle and in doing so, be independent of the vagaries of the rainfall and limitations with irrigation supplies at peak demand periods. The ability to store water outside of adjoining users (competing farms requiring irrigation at specific times of the year) will see this proposed operation improve the throughput of the water supplied in the Wah Wah Channel, to the benefit of all users, and have the ability to be off line when other users need supply.

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	Detail Poultry Shed Washing Procedures	The EIS did not indicate a treatment train for water used in washing and disinfecting the sheds. This is because the water remains within the sheds and is evaporated out prior to the reintroduction of new bedding material and the new batch of day-old chickens. Appendix A of the submitted Water Quality Report indicates that each shed will utilise 8000lts in this cleaning process which is around an average depth of water of 2.4mm over the shed floor. No water leaves the shed and it does not infiltrate into any groundwater aquifer. There is no contamination of groundwater as has been asserted. It is intended that all sheds will have concreted floors.
	Describe Composting Shed Leachate System	Further to the EIS, investigations with DPI Agriculture have indicated that leachate from a composting shed is not an issue and leachate is evaporated out of the biomass. It is intended that the Composting Shed will be constructed as per the advice contained within the DPI publication <i>Storing Poultry Litter Module 2</i>. It is acknowledged that mass burials will not be undertaken on site but will be the subject of a Farm Management Plan signed off by the Processor (the owner of the birds) that will have agreed scenarios, depending on the cause of the mass deaths.
	Proposed Installation of Groundwater Monitoring Bores	Partly discussed in responses below. It is noted that the current Wah Wah Channel No 5 is unlined and runs through the centre of the project. The idea that DoI Water wants to have the groundwater investigated when clearly the project is not going to use groundwater is puzzling and the fact that the same organisation has approved the removal of groundwater monitoring bores installed by Murrumbidgee Irrigation needs some explanation. Little water from the development is returned to groundwater, refer also to response regarding runoff from the property below, and the overall quality of water being returned to ground and surface water sources is better post development than the current existing arrangements.

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	Establishment of Baseline Groundwater Criteria	Given that the project will not be interacting with groundwater the request to establish baseline levels and existing groundwater quality are considered to be a surplus requirement.
	Mapping of Adjoining Groundwater Bores	Given that the project will not be interacting with groundwater the request to map neighbouring bores in the area and confirm their licencing details is considered a surplus requirement. Consideration of impacts on these neighbouring bores, whilst expected to be non-existent due to the stated fact that bore water will not be utilised as part of this development, the request for these details is also considered a superfluous requirement.
	Dam Construction Details	The current design plans included in Appendix K of the EIS provide relevant details of the operating levels of the dams, side slopes, maximum storage levels etc including their base levels. The request for lining details is considered to be a Construction Certificate issue. The dams will be constructed under geotechnical advice to ensure that they are sealed. Other requested construction details are only considered relevant to a Construction Certificate but the provided plans are sufficient detailed to provide appropriate advice on the bulk earthwork components of the project.
	Biosecurity Outline Sanitation methods for Drinking water	Typically, the management of the biosecurity risk involves the treatment of the water supply with chlorine as a sanitiser as the water is transferred to the tank storage and then some growers utilise a chlorine or TwinOxide injection to maintain sanitised water to the birds. On a daily basis, this water is tested and recorded for compliance with the standard of 1-2ppm free chlorine to the birds by the grower at the furthest drinker within the sheds. Sanitised water is also supplied to the air conditioners to ensure that potentially contaminated water is not available to the birds via any pathway. Additionally, it is possible that it may be necessary to treat the water with exposure to ultraviolet light and other water quality

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		arrangements, but these sorts of details are a matter to be fully discussed with the processor and form part of a Farm Management Plan that will be undertaken with the commencement of the operations.
	Dams and Water Fowls Outline methods to Discourage Wild Birds on Dams	It is noted that these dams will provide a habitat for wild waterfowl but this is not a unique occurrence within the Riverina Irrigation Districts. Waterfowl will be deterred from becoming a nuisance and an active Farm Management Plan will be appropriately adopted. The impact that disease has on the poultry industry from external vectors, such as Avian Influenza that may be spread from wild birds or water-borne viruses from wild waterfowl or birds that come in contact with livestock, is ever-present. However, with the sanitising of the water potentially when delivery to the storage tanks and/or re-sanitising for delivery to the shed drinkers, the threat is mitigated. Additionally, the dynamic nature of the Farm Management Plan could potentially see the netting of a supply dam if all other attempts to mitigate interaction with waterfowl were unsuccessful. The National Farm Biosecurity Manual actively supports farm dam usage. The treatment of the water to mitigate bacterial organisms is sufficiently robust so that significant wild bird deterrents are not always considered relevant. Although if the wild waterfowl become such a problem that the bacterial organisms approach the relevant threshold levels, the suggestion for the netting of the dam is a practical and effective method of control. There are several other techniques that are available for the control of wild birds such as auditory, visual, light and chemical deterrents, as well as the use of dogs. The yet to be released Federal Rural Industries Research and Development Corporation report on this

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		matter will be helpful to determine the best methodologies that may be utilised in the future.
	Water Hydrogeology and potential impacts on the Groundwater System	The EIS was structured to assess impacts. The comment relating to hydrogeology and potential impacts on groundwater are noted but they have nothing to do with the Application. Water is going to be sourced from the Wah Wah Channel No 5, an unlined Murrumbidgee Irrigation Supply Channel that runs through the middle of the proposed operations. It is intended that the internal supply dam will be sealed as per future geotechnical advice and that at no time in the future, will the development footprint be supplying any water to groundwater. The internal dam is a closed turkey nest facility that has been designed to even fully contain relevant 1% storm events at a time when the dam is 100% full. There are no current private usage bores on the property that intercept groundwater albeit a test bore has recently been installed to confirm groundwater quality and potential flow rates. There are two (2) current Murrumbidgee Irrigation bores on site, one of these is being used to actively monitor any groundwater but advice from MI that DoI Water has approved their removal, as they are excess to Murrumbidgee Irrigation's requirements, is evidence that the bores do not provide any appropriate or relevant groundwater advice. Local knowledge appears to be indicating that the bore water will be too saline and results from the test bore have indicated that the groundwater has salt at 4000ppm which is too salty for bird water supply and the development is not currently looking at installing water processing plants to have the water cleaned up. Water supply will be mostly from the Wah Wah Channel No 5 and recovered stormwater.

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	Surface Water Pollutants	The Stormwater Quality and Hydrology Report annexed to the EIS has specifically identified the source of the pollutants. Both Nitrogen and Phosphorous from rainwater are the identified pollutants that when added to Total Suspended Solids is the MUSIC Modelling pollutant focus. The pre-treatment arrangement is only tabulated to indicate the extent of the increases due to the change in landuse. It is the post treatment levels that are the relevant tables and must achieve a target of <i>Nil of Beneficial Effect</i>. Essentially the reuse of stormwater removes nearly 100% of the pollutants from escaping to the environment. The reason for the figures not reaching the 100% is that part of the development site, being the main access roads and dwelling sites are not being captured into the dam storages and it is this water that contains the relevant nitrogen and phosphorous pollutants. Given the calculation contained within the Report, the remaining levels of pollutants are not considered unacceptable and it is noted that they are far less than what the current existing farming operations currently discharge to the environment so that there is a positive outcome from the development with respect to surface water and groundwater. What is happening on site is that all stormwater is directed to swales and drainage lines from the entire internal poultry farming activity and reused in the sheds. Clearly Table 5 of the Water Quality Report identifies that targets have been met and that the post development scenario is clearly better than the existing scenario. How this table could be misinterpreted and questioned that pollutants have not been assessed is difficult to understand.

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	Drainage System	The drainage system is generally described in both the Water Quality Report and the individual engineering plans contained in the EIS Appendices. Basically, all stormwater from the site and that includes the sheds, hardstand and all internal operational areas, refer Figure 3 indicating the Post-Development Catchments included in the Water Quality Report, is being directed via a series of landform modifications and drains to the main storage dam where it will be reused in the farm. The quality of that water is immaterial as the main dam storage is sealed but there will be macrophytes planted within all drainage lines and around the main dam itself to help clean up the stormwater. The stormwater will then mix with the Murrumbidgee Irrigation supplied water, pumped to a series of reservoirs, sanitised in the pump shed and fed directly back to the birds.
	Runoff from the Property and Adjoining impacts	Table 5 of the Water Quality Report summaries the existing and post development scenarios. Stormwater discharge from the site is currently 3.28ML, post development it will be 1.62ML. The remaining water generated from the developed site will be captured by the dam. Groundwater is reduced with the take of 61.1ML but this is exempted waters under Schedule 1 the WM Regulations. These calculations only relate to the approximately 28ha of internal production area.
	Murrumbidgee Irrigation Monitoring Bores	Discussions with Murrumbidgee Irrigation has indicated that there are two bores on site with only one being actively monitored. It is understood that DoI Water have already approved that they are surplus to MI requirements and that they can be removed. MI have indicated in their response to the EIS that there will be a protocol for the decommissioning of the monitoring bores and consultation with MI will be required. This matter was also discussed on the 17th May 2018 with MI representatives.

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	Biosecurity Dam Biosecurity Risks and Water Treatment	A water turkey-nest dam poses a potential risk from wild waterfowl. Whilst this is acknowledged to some degree, the proposed treatment arrangements are typically how growers and processors deal with the matter and Appendices 3, 4 & 5 of the Farm Biosecurity Manual indicates the relevant standards and expected monitoring regime. DPI Best Management Practices provide limited advice however the National Farm Biosecurity Manual, Poultry Production supports the use of dam water and has specific chapters and clauses relating to the processes that should be undertaken for the use of dam water and this Manual covers all known matters and likely biosecurity threats to the farming operations from water, feed, air, animals, poultry, personnel, clothing, dead bird disposal and farm machinery. Matters relating to these potential biosecurity sources are evaluated on a farm by farm basis and the relevant Farm Management Plan is accordingly developed. As regards these farms, the potential of other adjoining uses as being a threat is generally negated by the diversion of any stormwater that does not originate from the quarantine area. Rodents will be controlled by regular rat bait stations around each shed. Farm personnel are supervised to ensure that foot baths and hand washing is undertaken prior to entry to the shed. Domestic farm animals are prohibited from the quarantine area. Feed systems are again closed systems to ensure that pathogens do not gain access to the birds. These are all standard poultry farming practices that become part of a Farm Management Plan, not matters that are particularly relevant to an EIS.
	Biosecurity Impacts on Adjoining Poultry Production	The proposed farms are outside of any DPI Agriculture Best Management Practices buffer distance recommendations with the exception of the distances to waterways. Whilst it is acknowledged that there is no science to these buffer distances, the industry has practically negated their requirements with increased attention to

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		water sanitation and improved farm management practices. Evidence of the success of the current industry practices has seen no major outbreaks or mass deaths in poultry production districts for >15 years. As regards the comment that this farm would/could be a threat to an adjoining poultry farm by the movement of birds along a public highway is ludicrous in the extreme. Just like the proposed operations with this development, all poultry farms are basically located away from these typical threats by their own biosecurity and quarantine protocols.
	Biosecurity and Disease Management	Typo error acknowledged and these should be read as Carrathool Shire Council.
	Other Comments	
	Food and Water Supply Noise Criteria	typo error acknowledged and the heading should have been Stocking Densities. The EIS has been prepared in accordance with the issued SEAR's No SSD 8036.
Murrumbidgee Irrigation	Removal of MI Groundwater Bores	Matter discussed with MI 17 th May 2018 and arrangements have been confirmed that the decommissioning of the MI monitoring bores will include a MI agreed process and that the process will address DoI requirements for the works. Issue should be addressed as a Condition of Consent.
	Potential increase in water supply entitlement	MI comments are noted and whilst general discussion has been undertaken regarding the capacity of MI to increase supply if required, no decision about this possibility is currently been considered.

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		The proponent is aware of its obligations regarding the MI Water Delivery Contract and Development Rules as well as the opportunities that will exist and be developed between MI and this development with the supply of water from the Wah Wah Channel in periods when other users will not require access to the channel water.
NSW Rural Fire Service	Establishment of Asset Protection Zones, compliance with PfBP 2006 and preparation of a Farm Management Plan that addresses that includes internal and external fire sources and mitigation strategies.	Issues raised by the RFS are considered appropriate and should be included as standard Conditions of Consent.
Office of Environment & Heritage (OEHL) – Heritage Division/Heritage Council of NSW	Heritage Division raises no requirements as there are no historic heritage issues on the site. Minor edits on the Aboriginal Cultural Heritage Assessment completed	Comments noted and agreed. Amended report refer Attachment 2
Office of Environment & Heritage	1. Impacts to biodiversity have not been fully considered. The BAR needs to demonstrate adequate identification and assessment of Indirect impacts to threatened species habitat as per Section 8.4 of the FBA, particularly addressing the existing PVP Offset Area abutting Farm 5. The assessment states that indirect impacts can be mitigated by future actions in an Ecological Management Plan but provides no details about the impacts or mitigation measures.	Refer Amended BAR Report in Attachment 3 Recommendations are included in the Amended BAR Report in Attachment 3.

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	2.The proponent is to prepare an Unexpected Heritage Items Procedure prior to construction. The procedure should outline mandatory reporting requirements of the proponent to submit a site card to AHIMS on the discovery of an Aboriginal object, outline how Aboriginal objects are to be managed upon discovery and what to do if human remains are identified on site.	
	An ACH Unanticipated Finds Protocol must be developed prior to construction and include the following requirements. <i>If any Aboriginal object is discovered and/or harmed in, or under the land, while undertaking the proposed development activities, the proponent must:</i> <i>1. Not further harm the object</i> <i>2. Immediately cease all work at the particular location</i> <i>3. Secure the area to avoid further harm to the Aboriginal object</i> <i>4. Notify OEH as soon as practical on 131555, providing any details of the Aboriginal object and its location</i> <i>5. Not recommence any work at the particular location unless authorised in writing by OEH.</i> <i>In the event that skeletal remains are unexpectedly encountered during the activity, work must stop immediately, the</i>	

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	<i>area secured to prevent unauthorised access, and NSW Police and OEH contacted.</i>	
	3. The development footprint does not appear to include clearing for the upgraded intersection of the access road and Mid Western Highway. OEH requires clarification about whether the intersection upgrading works include clearing of vegetation. If so, assessment should be completed in accordance with the SEARs.	All aspects of the intersection are now included in the Amended BAR Report in Attachment 3.
	<u>OEH Advice</u> 1.1 Is the ‘baseline’ for impact assessment reasonable? 1.2 Are predictions of impact robust (and conservative) with suitable sensitivity testing? 1.3 Has the assessment considered how to avoid and minimise impacts? 1.4 Does the proposal include all reasonably feasible mitigation options? 2. Is the assessed impact acceptable within OEH’s policy context? 3. Confirmation of statements of fact Statements of fact about biodiversity and Aboriginal cultural heritage values are correct.	Yes Yes Yes Yes Yes

Agency/Public	Issue(s) Raised	Response
	Statements of fact about impacts to biodiversity are incomplete.	
	4. Elements of the project design that could be improved • Farm 5 is very close to the existing Property Vegetation Plan offset area, which has been set aside for biodiversity conservation to offset previous clearing on the proposal site. ○ Opportunities for increasing the distance between Farm 5 infrastructure and the offset area should be explored. ○ The EIS does not assess the impacts of construction or operation of the proposal on the offset area, or demonstrate how impacts have been avoided or minimised. • The proponent's commitment to biodiversity mitigation and management actions would be clarified by including details about what impacts are being mitigated by the action, project stage, timeframes, triggers for management intervention, outcomes and responsibility for each action.	Farm 5 is not proposed to be shifted northward. A number of recommendations have been given to protect and enhance the PVP Offset area. These include fencing, revegetation of low-quality areas of Belah/Black Oak - Western Rosewood - Wilga woodland vegetation and dryland cropping areas within the fenced PVP. General weed control has also been recommended for the PVP area and all other areas of native vegetation within the site.
	<u>Aboriginal cultural heritage</u>	

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	OEH has reviewed the report: Advitech, Jan 2017 (Rev 3), 'Archaeological Report Historic Heritage and Aboriginal Cultural Heritage Assessment Goolgowi Poultry Farm for Tattersall Lander'. The baseline report for impact assessment for Aboriginal cultural heritage is reasonable and generally consistent with the requirements in the letter from the OEH dated 3 May 2016 attached to the SEARS (SSD 8036). Comments and summary of key findings are provided below. 1. Heritage Division are the appropriate section of OEH to provide feedback in relation to historic cultural heritage. Heritage Division can be contacted on heritage@heritage.nsw.gov.au if they have not already been provided with a copy of the assessment. 2. No Aboriginal objects or potential archaeological deposits were identified during the assessment. OEH confirm that the assessment included desktop review and a search of AHIMS, Aboriginal community consultation in accordance with the 'Aboriginal cultural heritage consultation requirements for proponents 2010' (DECCW 2010) and archaeological field survey (Advitech, 2017:25).	

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	3. No AHIMS sites were identified within 1km of the study area during the AHIMS search dated 6 May 2016 (Advitech, 2017:15). 4. Table 1 – the effective survey coverage is incorrect and should be recalculated (Advitech, 2017:25). The value of 81% does not take in account the areas that have not been surveyed. The report says field survey was targeted to areas that were relatively undisturbed with the greatest exposure of ground surface and landforms suitable for occupation. This is verified by a map (Figure 8) showing areas surveyed. The effective survey coverage would be much lower than 81% and should be recalculated. 5. Section 7.1 has an outdated definition of a ‘relic’ (Advitech, 2017:33). This definition should be amended according to Section 4 of the NSW <i>Heritage Act 1977</i>. The report has recommended an ‘Unexpected Heritage Items Procedure’ be developed. This should be a condition of development approval, to be implemented prior to construction (see Attachment A). <u>Biodiversity</u> The Biodiversity Assessment Report (BAR) does not fulfil the requirements of	

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	the Framework for Biodiversity Assessment (FBA). Specifically: • The assessed development footprint does not appear to include all activities that will result in clearing of vegetation. • Indirect impacts have been mentioned but not clearly identified. Indirect impacts need to be assessed along with measures for avoidance or mitigation. <i>Please note that the Threatened Species Act 1995 has been repealed following commencement of the Biodiversity Conservation 2016 (BC Act) on 25 August 2017. However, Savings and Transition provisions are in place to allow former assessment methods to be used in some circumstances.</i> <i>The comments below recommend continuing processes according to the previous Offsets Policy, rather than as requirements of the BC Act. There may be time restrictions within the transitional period, after which the assessment will need to be in accordance with the more recent legislation.</i> OEH Assessment Requirements OEH do not require the FBA credit calculator to be used for this proposal, however the biodiversity assessment is to	The footprint has been revised to include all activities that will require clearing, particularly the intersection with the Mid Western Highway

Agency/Public	Issue(s) Raised	Response
	be consistent with the FBA in other regards. Wildthing Consulting notified OEH that the only biodiversity impact due to the proposal was removal of a single tree. In email advice to Daryl Harman of Wildthing Consulting on 12 September 2017, OEH advised that:	
	• The SEARs issued from the Department of Planning and Environment (DPE) state that the assessment of biodiversity to be undertaken in accordance with the Framework for Biodiversity Assessment (FBA). However, the original advice from OEH to DPE was that this was required unless “otherwise agreed by OEH”. • The assessment does [not] require the use of the credit calculator associated with the FBA to determine whether an offset requirement is necessary, given the impact is a single tree. • An assessment of biodiversity is recommended that is consistent with the FBA in other regards – that evidence of how impacts on biodiversity have been avoided and any mitigation factors, such as fencing, landscaping and weed control are clearly documented.	The assessment has been revised to be consistent with the FBA process.

[illegible]

Agency/Public	Issue(s) Raised	Response
	• Vegetation field assessment – Correct survey protocols have not been followed, including the size of vegetation plots and use of the Braun-Blanquet cover scores instead of 20-point cover and abundance scores. • Flora and fauna survey results – Much of the information provided in the BAR is not relevant to the FBA process. Minimum requirements for a BAR are outlined in Appendix 7, Table 20 of the FBA. All other information should be provided as an appendix, if desired. • Threatened species – BAR Section 8 Considerations under Section 5A of the EPA Act is not relevant to this assessment. – The ROTAP list was replaced by the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i>. The ROTAP status has no legislative standing and is not required for the BAR. • Impact Assessment – BAR Section 6 (page 36) is inadequate.	The correct Biobanking Plots were undertaken. However, they were not put into the original report as the information was thought that it was not required to be used in the tool. The plot information in its appropriate form has been added to the updated report. The report has been revised to conform with minimum requirements of the FBA. Considerations under Section 5A of the EPA Act have been removed from the report. References to ROTAP species have been removed from the report. The impact to the clearing for the Mid Western Highway upgrade has been taken into consideration within the revised report.

Agency/Public	Issue(s) Raised	Response
	– The direct impacts of the proposal on biodiversity have not been fully described. These are likely to include clearing for the Mid Western Highway intersection, which is mentioned in EIS Section 2.6 (page 71) “as proposed for construction with the initial shed construction activity.” – The conclusion (page 40) states that the proposal is unlikely to have a significant impact on threatened species recorded on the site to the extent that a local population would become extinct, contingent on “recommendations of management and protection of areas of native vegetation”. This statement needs to be demonstrated through the FBA process. – The appropriate way to assess indirect impacts for this proposal was through application of the FBA Section 8.4. – Assessment of impacts should include habitat for the three threatened fauna species recorded from the site survey – <i>Pomatostomus temporalis</i> (Grey-crowned Babbler), <i>Circus assimilis</i> (Spotted	Contained within the revised report.

Agency/Public	Issue(s) Raised	Response
	Harrier) and <i>Chalinolobus picatus</i> (Little Pied-bat). - Avoidance and mitigation measures - The biodiversity assessment appears to provide mitigation measures for indirect impacts but doesn't clearly identify those impacts or the biodiversity values being impacted. - Section 8.4 of the FBA should be used for demonstrating how indirect impacts on biodiversity values have been minimised using reasonable onsite measures. - Impacts to be addressed by the Ecological Management Plan have not been identified. - Indirect impacts to be included are listed in a separate section below. - Mapping - Appropriately scaled maps are provided that show precise location and extent of all clearing associated with the proposal have not been provided. - Vegetation zones have not been mapped. - Digital datasets (e.g. ESRI shapefiles) for all maps in the BAR	Appropriate maps have been added to the updated report. All spatial data will be supplied.

Agency/Public	Issue(s) Raised	Response
	and spatial data generated for the assessment have not been provided to OEH, as required in Section 3.2.1.4 of the FBA. <u>Impact Assessment</u> The impact assessment should include, but not be limited to, the following: • Potential for weed introduction and spread due to construction. • Vegetation screening of the mounds is mentioned in EIS section 2.6, page 71. Site landscaping and revegetation practices have the potential to introduce exotic species into remnant native vegetation, particularly the existing PVP offset. Mitigation measures can include planting of species that occur naturally in the surrounding vegetation, or use of species that are known not to become weedy in the region, and use of weed free hay bales for revegetation works. • Adequacy of v-drains to mitigate runoff from earth mounds shown on Appendix K farm diagrams. • EIS Appendix K – Development Plans Farm 5: – House sites are proposed to the south of the shed array. It is unclear how vehicles access the proposed houses, and whether the vehicle	Plantings and revegetation have been added to mitigation measures. The V-drains have been designed for 1% rainfall events The house sites will be situated within the vicinity of each farm outside the earth mounds but within the cropping area.

Agency/Public	Issue(s) Raised	Response
	access around the shed array is within or outside the earth mound. - Distance between Farm 5 infrastructure, including houses, and the existing native vegetation that is part of the PVP offset should be clarified along with an appropriate buffer to minimise any identified impacts. - Description of avoidance: the farm subdivision layout appears to be constrained by existing irrigation channels. Is it likely that planned replacement of the Wah Wah irrigation channel system with pipes will result in decommissioning of the channel between Farm 1 and Farm 5? If so, is Farm 5 able to be moved north to give a wider buffer to the PVP offset area? <u>Ecological Management Plan</u> An Ecological Management Plan may not be required if the BAR adequately addresses mitigation measures for landscaping, weed control measures to protect native vegetation during construction, weed management that will be undertaken as part of the site maintenance program, and adequate protection of the PVP offset. To ensure that mitigation and management actions are carried out at the	There change to the position of Farm 5. Recommendations have been given to enhance the area in the far north of the PVP area to conform to Belah/Black Oak - Western Rosewood - Wilga woodland. Mitigation measures have been further detailed.

Agency/Public	Issue(s) Raised	Response
	appropriate time, OEH expect to see the following details for each mitigation action: • Who will be responsible for individual actions (including the position title of the officer responsible) • Triggers for management intervention • Outcome or measure of success • When the action will be completed These details should be complete before the start of construction to clearly identify the proponent's commitments for management and mitigation.	
Roads Maritime Services	& Roads & Maritime Services has assessed the Development Application based on the documentation provided and would raise no objection to the development proposal subject to the Consent Authority ensuring that the development is undertaken in accordance with the information submitted as amended by the inclusion of the following as conditions of consent (if approved):- 1. A maximum of one (1) driveway is permitted to the Mid Western Highway (HW6) to provide for access to the development site. Any redundant driveways or gates to the Mid Western Highway are to be removed in accordance with Council requirements. any damage or disturbance to the road reserve of the Mid Western Highway is	Only one entrance is proposed. Comment noted and issue to be a Condition of Consent.

Agency/Public	Issue(s) Raised	Response
	to be restored to match surrounding landform in accordance with Council requirements.	
	2. The intersection of the Mid Western Highway and the proposed access road is to be located and the roadside maintained so as to provide the required Sight Disturbance requirements for intersections in accordance with the Austroads Publications as amended by the Roads and Maritime Services supplements for the posted speed limit. Compliance with this requirement is to be certified by an appropriately qualified person prior to construction of the vehicular access.	Noted and issue to be a Condition of Consent.
	3. As a minimum the intersection of the Mid Western Highway and the proposed access road shall be conducted to the standard of a public road intersection with a Basic Right Turn (BAR) and Auxiliary Left Turn (AUL) intersection treatment in accordance with the Austroads Guide to Road Design for a Road Train route as amended by the supplements adopted by Roads and Maritime Services for the posted speed zone on the Mid Western Highway.	The inclusion of a Basic Right Turn is an RMS addition to the intersection required by the Traffic Impact Assessment. The comment is noted and the proposed intersection design by Tattersall Lander has been amended to comply with these RMS conditions. Issue to be a Condition of Consent.
	4. The intersection of the proposed access road with the Mid Western Highway shall be designed and constructed so	The proposed intersection design complies with these RMS conditions. Issue to be a Condition of Consent.

Agency/Public	Issue(s) Raised	Response
	that any vehicles entering or exiting the development are not required to cross to the opposing travel lane of the highway in order to perform the access or egress manoeuvre to/from the proposed access road. The proposed access road is to be line marked to separate the swept path of vehicles entering and exiting the development. Associated directional marking and signage is to be installed and maintained in accordance with Australian Standards.	
	5. The access road from the Mid Western Highway shall be constructed perpendicular (or at an angle of not less than 70 degrees) to the carriageway of the highway to a minimum width of 7 metres to accommodate 2 way movement of vehicles and be bitumen sealed with a pavement and road surface suitable for road trains for a minimum length of 50 metres from the carriageway of the Mid Western Highway.	The proposed intersection design complies with these RMS conditions. Issue to be a Condition of Consent.
	6. A management plan to provide measures to suppress dust generation from the development site and the access road shall be prepared and implemented to the satisfaction of	It is proposed that the main access road to the farms will be a sealed road as per the proposed Intersection Plans and pages 2 and 4 of the Farm 2 Plans.

Agency/Public	Issue(s) Raised	Response
	Council and Roads and Maritime Services.	
	7. The intersection of the proposed access road with the Mid Western Highway is to be designed, constructed and maintained so as not to interfere with the capacity of the current roadside drainage network and to prevent water from proceeding onto, or ponding within, the carriageway of the highway. If a culvert is to be installed and be located within the clear zone of the highway for the prevailing speed zone it is to be constructed with a traverse type headwall.	Noted. The proposed intersection design complies with these RMS conditions. Issue to be a Condition of Consent.
	8. Conditions relevant to the construction of the intersection and access road are to be completed prior to issue of a Construction Certificate for the construction of sheds for the housing of birds on the subject site. This is to ensure safe access arrangements are provided for the construction activities on the development site.	Given the timeframe to undertake the internal construction of each of these large facilities of around 12-18 months, it is requested that the external roadworks be undertaken concurrently with the internal bulk earthworks. Machinery for the major bulk earthworks would only enter on one day and then exit after about 6 months. The movement of construction equipment is in reality much less than a cropping operation which would have multiple trucks taking grain to storage silos and headers moving in and out of the property. The proposed construction arrangements would still need to ensure that there are no issues caused to the Highway, but to hold up the significant internal works until the Highway is completed is a significant financial and timely concern. It is noted that the Highway design will be subject to a WAD arrangement and that is in itself a lengthy process.
	9. A management plan to address construction activity access is to be prepared prior to commencement of	Noted. Issue to be a Condition of Consent.

Agency/Public	Issue(s) Raised	Response
	construction activity on the development site. Appropriate signage and fencing is to be installed And maintained to effect this requirement for the duration of the construction works.	
	10. The Mid Western Highway (HW6) is part of the State Road network. For works on the State Road network the developer is required to enter into a Works Authorisation Deed (WAD) with Roads and Maritime Services before finalising the design or undertaking any construction work within or connecting to the road reserve. The applicant is to contact the Land Use Manager for the South West Region on Ph. 02 69236611 for further detail.	Noted. Issue to be a Condition of Consent.
	11. Any works within the road reserve of the Mid Western Highway requires concurrence from Roads and Maritime Services under section 183 of the Roads Act 1993 prior to commencement of any such works. The developer is responsible for all public utility adjustment/relocation works, necessitated by the development and as required by the various public utility authorities and/or their agents.	Noted. Issue to be a Condition of Consent.

Agency/Public	Issue(s) Raised	Response
	12. Works associated with the proposed development shall be at no cost to Roads and Maritime Services.	Noted. Issue to be a Condition of Consent.

3. Responses to Individuals

Table 6 - Detailed Responses to Individual Submissions

Agency/Public	Issue(s) Raised	Response
Janette Naismith (Neighbour)	1. <u>Size</u> – the district already has in excess of 200 chicken sheds – this development will add 50% (100) more to the total – 6,000,000 chickens is a lot of chickens by any measure and will overload the landscape and environment.	Whilst the size of the operations is large, the proposed development will be landscaped out of the public view. Matters of traffic, odour and noise are the subject of specialist reports that have concluded that the proposed development is consistent or within acceptable relevant standards.
	2. <u>Water</u> – I am concerned that the water requirements for this development will get precedence – we rely on irrigation water delivered by channel and only so much water can be delivered through the system – our property is unable to get full allocation at the present time and I do not see this situation improving with a development of this size.	Discussions with Murrumbidgee Irrigation has indicated that MI will enter into a supply agreement with the farm operations and they will provide the water to all farms as per their Agreements. It should be noted that MI see the benefits of the large 300ML storage dams as a way to increase the quality of the channel water to all farms in this location as there will be the opportunity to have these dams operated out of sequence to other farming operations.
	3. <u>Water Table</u> – Dams, storage and earthworks all disrupt the natural landscape and the flow and penetration of water – our stock and domestic bores draw from the same water table and I am concerned at what might leach into	It is proposed to have sealed dams within the operations so interaction with groundwater is not going to occur. The water quality Report provides a quantification of the impact of pollutant loads from the existing operations and the proposed operations and the results are positive for the environment.

Agency/Public	Issue(s) Raised	Response
	the underground water supply from such an intensive operation over the longer term.	
	4. <u>The Wah Wah and Mirrool Creeks</u> – these creeks run in years of higher rainfall and sometimes they flood. They provide a habitat for many animals and plants. Further land clearing and levelling of the land and the building of earth banks disrupts the movement of water and alters the natural course of these creeks and the immediate wetlands. Once the wetlands are gone, the animals and plants are gone forever. Token retention of a tree here or there on these developments, whilst commendable in the short term, is really a death sentence for the trees. So much of the land has already been cleared that what trees are left need to be preserved at all costs and new trees established.	The proposed development is >800m from the closest point of Wah Wah Creek and about 17Km to Mirrool Creek. No part of the development is utilising land that would /could be used to direct the flow of flood waters. The removal of one tree that could be legally removed under the LLS Act is not considered clearing of land. The design of the development is not about the token retention of individual trees as the proposed landscaping plans are indicating that a significant number of trees will be added for the development.
	5. <u>Odours and Noise</u> – Physical barriers, such as proposed earth embankments, may block the view but the smells are still evident. I can already enjoy the odour of sheds in the district which are further away. I have no doubt that there are strict controls for noise and odour and that modern technology can provide many solutions as detailed by	Noise and odour will be required to comply with strict EPA issued standards. A compliant weather monitoring station as per AS/NZS 3580.14:2014 is proposed to be installed to assist the operators in odour management. Poultry farms have several backup systems so issues with power outages are not considered an issue. Additionally, the current general power supply to this region is 2 phase 11Kv and this will be upgraded to a 3 phase supply with this development.

Agency/Public	Issue(s) Raised	Response
	the applicant at the public meeting. I am not reassured by the applicant, who for one will not live next door and who can give no guarantees that when the temperature is mid forties for a week, and there is a power outage for whatever reason, that the operation will remain sweet and clean.	
	6. <u>Traffic Safety</u> – I regularly drive the Mid Western Highway and our property fronts the same Highway. The increased traffic that will result from this development will just add to an already busy road. There are a number of school bus stops along this section of Highway and slower traffic when entering and exiting the development onto the Highway is cause for concern when this traffic is mixed with local and regular heavy haulage vehicles plying the Highway. I would consider and entry from McRaes Road a much safer option.	The proposed intersection has RMS approval and the suggested McRaes Road intersection is demonstrably shown to be unacceptable and non-compliant with AUSTRoads standards. Refer to the attached Intersection Plans.
Neville Charles Naismith (Neighbour)	1. The size of the proposed operation – 6,000,000 chickens is a large number of chickens and this development will add 100 sheds to some 200 sheds already spread across the Shire of Carrathool. Whilst many of these intensive poultry operations are smaller, collectively they have a huge impact on the environment	Whilst the size of the operations is large, the proposed development will be landscaped out of the public view. Matters of traffic, odour and noise are the subject of specialist reports that have concluded that the proposed development is consistent or within acceptable relevant standards.

Agency/Public	Issue(s) Raised	Response
	and those living close by – 50% more increase on the number already in place is a significant increase.	
	2. Availability of water – this is a farming area that relies on irrigation water which comes by supply channel and I am concerned that developments such as this and their continuous requirement for water will put added stress on a system that is, in my opinion, unable to deliver full allocations at present.	Discussions with Murrumbidgee Irrigation has indicated that MI will enter into a supply agreement with the farm operations and they will provide the water to all farms as per their Agreements. It should be noted that MI see the benefits of the large 300ML storage dams as a way to increase the quality of the channel water to all farms in this location as there will be the opportunity to have these dams operated out of sequence to other farming operations.
	3. The control of noise and odours – emissions from this development will not be unnoticeable and the effect on those living close by may be quite serious. Earthen banks can hide the infrastructure, but the odours that permeate the surrounding area will be quite noticeable. The applicant will not be living on-site, and neither will the owners or investors. I am sure that modern technology can play a part in reducing the effect of emissions on neighbours and that the housed bird's welfare is of paramount importance, but unless these intensive farming operations are policed and operators held accountable, I am sceptical, that what has been promised by the applicant will be delivered at all times during the life of the operation. Those	Noise and odour will be required to comply with strict EPA issued standards. A compliant weather monitoring station as per AS/NZS 3580.14:2014 is proposed to be installed to assist the operators in odour management.

Agency/Public	Issue(s) Raised	Response
	that set these operations up are never to be found when something goes amiss down the track. The odours from current operations are already quite noticeable in the district and living next door to this development brings the problem just that much closer.	
	4. Traffic safety – increased volumes of traffic onto and off the Mid Western Highway would be better avoided. In my opinion McRaes Road entry and exit would be a far safer option. Heavy vehicle traffic on the Highway does not need to be impeded by slower moving vehicles entering and exiting onto the Highway from this site.	The proposed intersection has RMS approval and the suggested McRaes Road intersection is demonstrably shown to be unacceptable and non-compliant with AUSTRoads standards. Refer to the attached Intersection Plans.

4. Conclusion

This Response to Submissions has required amended specialist reports for the following matters:-

- a. Air Quality
- b. Aboriginal Cultural Heritage
- c. Biodiversity Assessment Report, and

The following plans have been prepared to provide clarification or additional information:-

- d. Proposed Highway Intersection plan
- e. Individual Farm Layout Plans.

All matters raised by Agencies or individuals have been addressed and there is a commitment by the proponent to continue to undertake this development with industry best practice behind all operational decisions. The proponent also is committed to the local community and will actively seek engagement with Carrathool Council, neighbours and local businesses to develop a good neighbour relationship with all participants.

The development of this farming complex will have many long-term positive outcomes and economic benefits for the local area and specifically this particular area within the Goolgowi locality with the installation of 3 phase power that will provide many farms frontage to reliable electrical power. The workers needed to construct and then run these farms will provide a long-term employment base for the locality, town and region.

The original EIS and then the subsequent amended reports and plans indicated above reinforce the view that on merit, this development can be undertaken with minimal risk to the environment and neighbours and will provide, on balance, a positive economic outcome to the community.

Attachment 1 - Air Quality Assessment by Advitech

**Attachment 2 - Archaeological Report, Historic Heritage and
Aboriginal Cultural Heritage Assessment by Advitech**

Attachment 3 - Biodiversity Assessment Report by Wildthing Environmental Consultants

Attachment 4 - Proposed Highway Intersection Plans by Tattersall Lander

Attachment 5 - Proposed Poultry Farms 2, 3, 4, 5 and 6 Individual Layout