

2 July 2026

Att: Belinda Kennewell
Department of Planning, Housing & Infrastructure
Level 31, 4 Parramatta Square
Parramatta NSW 2150

By Email:

**Re: State Significant Development Application (SSDA) Assessment –
Submission on Environmental Impact Statement (EIS) * Application Number: SSD-93649710**

Project Name: Lowesdale Pig Breeder Farm

Location: 7550 Riverina Highway, Lowesdale (Lot 125 DP661622)

Dear Belinda,

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) currently on exhibition for the proposed Lowesdale Pig Breeder Farm (SSD-93649710). Federation Council supports sustainable primary industry production and value-adding agribusiness inside our RU1 Primary Production zones, provided that localized infrastructure strains, cumulative regional impacts, and community amenity issues are robustly evaluated, avoided, and conditioned.

Following a multidisciplinary technical review of the applicant's submission package—specifically the Traffic Impact Assessment (Appendix R), Odour Impact Assessment (Appendix P), and the consolidated Mitigation Measures (Appendix X)—Council raises a progressive but firm position. We request that the Department incorporates the following critical conditions into any final Development Consent to insulate local assets and ratepayers from long-term capital, maintenance, and environmental costs.

1. Traffic, Road Quality, and Local Pavement Infrastructure

The applicant's Traffic Impact Assessment (TIA) notes that the project will utilise One Tree Lane's intersection with the Riverina Highway to haul livestock, feed, and waste via heavy vehicles up to a 26-metre B-Double profile. While network-level operational performance continues to satisfy baseline requirements, the localised physical strain on Council assets is profound. Council requires the following locked into the conditions of approval:

One Tree Lane Road Upgrade: One Tree Lane is currently an unsealed, council-controlled local road. The applicant must be required to fund and execute full gravel-surface road upgrade works to achieve a 6.0-metre carriageway width with 1.0-metre shoulders from the primary development site access directly to the Riverina Highway intersection, completely aligning with Council's Engineering Development Standards.

2. Interconnected Agribusiness Scaling & Cumulative Impacts

This application forms part of a major regional operational re-alignment by JBS Pork Australia. It represents the initial phase of a broader five-project pipeline consisting of three new regional breeder farms, a nucleus farm, and a massive density reconfiguration at the co-located Redlands Grow-Out site. Council requests that the Department enforces the following system-wide safeguards:

Coordinated Workforce & Housing Plan: Due to overlapping structural delivery timelines, construction stages may trigger concurrent regional labour demand shocks. The developer must submit a final Workforce and Accommodation Co-ordination Plan to guarantee that short-term subcontractor influxes do not compromise rental market affordability or displace local services within the Federation Shire.

3. Amenity Protection, Odour Safeguards, and Compliance Infiltration

The applicant's air quality profile operates on a Level 1 and Level 1.5 separation distance evaluation using S Factor calculations rather than full predictive dispersion modelling. Council requires strict operational thresholds to verify that community buffer margins function robustly in all weather configurations:

Retention of Buffer Integrity: The closest off-site dwelling (Sensitive Receptor 4 / L27) stands approximately 1,387 metres from the proposed footprints, conforming strictly to the baseline required buffer margins. Council will rigorously enforce this zone and maintain restrictions on any development modifications that encroach into this sensitive perimeter.

4. Regulatory Recovery Framework

To insulate our constituency from unexpected administrative burdens, Council explicitly requests a Compliance Cost Recovery framework. If verified dust, odour, or noise notifications emerge from operational failures, the administrative costs associated with deploying independent regulatory equipment and technical testing must be borne entirely by the operator, rather than council taxpayers.

Council looks forward to collaborating closely with the Department of Planning, Housing and Infrastructure to protect and advance our local infrastructure and primary production resilience. If you require further engineering metrics or clarification on the strategic points raised above, please contact our directorate directly.

Yours faithfully,



Jessica McFarlane
Manager Planning & Development