

# Submission on Development Application SSD 6882

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I have some comments about the proposed ProTen Euroley poultry production complex as follows:

## **1. Isolation due to flooding of access roads**

The sections titled 'Historical Flooding' and 'Flood Warning' on p97 of the Environmental Impact Statement (EIS) are inadequate and inaccurate.

Given the importance of the connection to feed supplies, as well as the processing and rendering plants in the Griffith area it seems incongruous that this massive development should proceed on the basis of some 'Anecdotal evidence .....' about one flood event (2012).

What about 1989, 1974 and 1956 to name a few floods that were much more prolonged than either the 2010 or 2012 floods. Would it be that difficult to find out how long access to Griffith would have been cut in those years?

The EIS states that access was available to the south during the 2012 flood. This is correct but the 2012 event was not widespread, it was predominantly in the Murrumbidgee valley. In a big flood year where large parts of the continent are inundated, such as in 1974, access to the south would also be cut. Therefore feed could not be sourced from Victoria and nor could live or dead birds be processed or rendered in Victoria.

Eight days of feed reserve held on site will not be nearly enough during a large flood event.

The 2012 flood arrived very rapidly in the Euroley district because of the huge amount of local rainfall. In that instance there would have been no time to harvest birds or bring in extra feed before the access roads were cut.

How long will the on-site dead bird chiller room be able to handle the average 3,400 dead birds per day? What happens when the chiller is full and access to a rendering plant is not possible because of flooding? Will they be buried on site? The shallow groundwater in the district should rule this out as an option but how else?

## **2. Traffic**

The proposed intersection on the Sturt Highway appears to be in quite a dangerous location, situated in a depression between two small rises.

From a safety perspective, a much better option would surely be to use Mundara Road which also has frontage to the proposed complex. This intersection has excellent visibility in both directions.

If the proposed intersection site is to proceed then turning lanes would be essential to help alleviate some of the risk.