

25 September 2018

Contact: *Alison Kniha*  
Telephone: *02 9865 2505*  
Our ref: *D2018/100038*

Sally Munk  
Principal Planner  
Industry Assessments  
Department of Planning & Environment  
GPO Box 39  
Sydney NSW 2001

CC: Luisa Maguire

Dear Ms Munk

**Rushes Creek Poultry Production Farm (SSD 7704) – Rushes Creek Road, Rushes Creek**

Thank you for your letter dated 4 September 2018 inviting WaterNSW to make a submission to the exhibition of the EIS for the above proposal. WaterNSW attended the Planning Focus Meeting held on site on 9 June 2016 and responded to the Request for input to the SEARs on 29 June 2016 (our ref: D2016/73695).

WaterNSW has reviewed the exhibited EIS and makes the following comments:

- The EIS (Reference Vol 1 s1.8) states WaterNSW is now part of the Department of Industry, Lands & Water – this is not correct. On 1 July 2016 a number of functions transferred from DPI Water to WaterNSW, while others transferred to Lands & Water. WaterNSW owns and manages Lake Keepit and Keepit Dam immediately adjacent to, and potentially impacted by, the proposal. Keepit Dam's primary use is for irrigation in the Namoi Valley and town water supply in Walgett. Lands & Water are responsible for planning, policy development, and the regulatory frameworks for regional water in NSW.
- The proposed erosion and sediment controls in the EIS (Vol.1, s4.3 and Appendix K) are noted, including clean water diversions comprising a deflection bank and swale drain around the PPUs. These measures are supported and should be fully established prior to construction and maintained throughout the construction and operational phases of the development.
- Sections 4.14.11 and 4.16.7 discuss measures relating to the management of wastewater, including an AWTS with 200m<sup>2</sup> of subsurface effluent irrigation for each manager's dwelling and another at each PPU for a total of 12. There is no indication on the location of the systems or effluent management areas (EMAs) either in the discussion or on the indicative civil plans in Appendix K. It is noted the office / workshop for Farm 1 is immediately adjacent (and upslope of) the swale diversion drain intended to divert clean water around the PPU (Appendix K; Dwg C05 Rev 2; 23.08.2018). There is a risk of effluent entering the clean water swale and it is recommended the swale is extended upslope of workshop, AWTS and EMA. In this way any effluent plume from the EMA will be captured in the closed water system and detention dam. The location of the AWTS and EMA for the manager's cottage should be assessed to ensure no potential for the wastewater or effluent to enter the clean water flows and should be clearly identified on the final civil plans.
- Section 4.16.6 of the EIS discusses water reuse from the detention dams, which includes wash down runoff from swales between sheds, to irrigate planted vegetation screens. It is

noted in Figure 22 (Vol.1; p.81) the vegetation screens are outside the clean water diversion drains. It is recommended the clean water diversion drain at each Farm is expanded to sit outside the vegetation screen to ensure any runoff of irrigation water re-enters the closed water system rather than the clean water diversion drain.

- Section 4.17.2 identifies both dirty and clean water diversions are directed to the detention dam. Although it is later explained the clean water is kept separate, the EIS should be amended to clarify this and ensure the capacity of the detention dam is not compromised by clean water inflows.

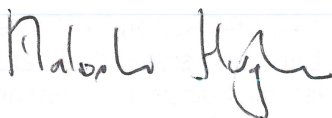
It is noted the clean water is specifically re-directed into the downslope drainage lines for Farms 2 and 4 (Diversion of Intermittent Drainage Lines; p.144). Farm 1 is located immediately at the head of a drainage depression with a shorter flow path into Lake Keepit than either Farm 2 or 4. Measures to direct the diverted clean water flow safely into this drainage depression should be included for Farm 1. Construction and management of the detention dam for Farm 1 should not compromise the drainage depression and include desilting to prevent reductions in capacity leading to potential spills. There should be no discharges from any detention dam (for events up to the 1% AEP).

- Section 4.18.1 identifies management measures for the removal of all dead birds, which is supported. For mass mortalities, no on-site disposal should occur. The EIS identifies burial at the development site is not considered suitable due to the proximity of the Namoi River and Lake Keepit. This is supported, however composted birds (from the in-shed composting option) should also not be used on the development site.
- It is noted in Section 6.1.2 the proponent commits to consulting with agencies as the project progresses. WaterNSW requests we are consulted during the development of the OEMP.

WaterNSW requests the Department continue to notify us of all SSDs on land adjacent to WaterNSW land, assets and infrastructure. All notifications should be sent via email to the address [Environmental.Assessments@waterNSW.com.au](mailto:Environmental.Assessments@waterNSW.com.au).

If you have any questions regarding this letter, please contact Alison Kniha on 9865 2505 or at [alison.kniha@waterNSW.com.au](mailto:alison.kniha@waterNSW.com.au).

Yours sincerely



**MALCOLM HUGHES**  
**Manager Catchment Protection**